TSD File Inventory Index

Date: December 18, 2000

Initial: CMGenerao

Facility Name: Viskase Corporation (West Plant - On Former Site)

Facility Identification Number: ILD 000 821 462 ✓

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	✓	.1 Correspondence	
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	✓	**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	✓
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	✓	.3 State Prelim. Investigation Memos	
.1 Correspondence	✓	.4 RFA Reports	✓
.2 Closure/Post Closure Plans, Certificates, etc	✓	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total — 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not require individual folder per schedule.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

APR 8 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Chuck Mackus
Environmental Coordinator
Union Carbide Corporation
6855 West 65th Street
Chicago, Illinois 60638

RE: Interim Status Acknowledgement USEPA ID No. ILD000821462
FACILITY NAME: Union Carbide Corporation

Dear Mr. Mackus:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

GRA 4/8/82

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: C.J. Brounstein, Vice President, Operations

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S790
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
III. LOCATION OF INSTALLATION	000140 AUG 1980

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F ILD000821462 T/A 2 C 1	A	800818

I. NAME OF INSTALLATION

UNION CARBIDE CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3733 WEST 65TH STREET

CITY OR TOWN: CHICAGO — ST.: IL — ZIP CODE: 60638

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 6855 WEST 65TH STREET

CITY OR TOWN: BEDFORD PARK — ST.: IL — ZIP CODE: 60638

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: ODEWALD ROBERT ENVIR. COORD.

PHONE NO. *(area code & no.)*: 312-496-4640

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: UNION CARBIDE CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON–FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD000821462

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	I	L	D	0	0	0	8	2	1	4	6	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F002	F003	F005		
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P010	P022	P024	P064	P076	P077
37	**38**	**39**	**40**	**41**	**42**
P098	P100	P105	P106	P119	U002
43	**44**	**45**	**46**	**47**	**48**
U003	U012	U018	U019	U021	U031

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[X] 2. CORROSIVE (D002)	[X] 3. REACTIVE (D003)	[X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
N. T. LaPlaca	N. T. LaPlaca, Plant Manager	8/14/80

PAE

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → ILD000821462 REACKNOWLEDGEMENT

UNION CARBIDE CORP
6855 WEST 65TH ST
CHICAGO IL 60638

INSTALLATION ADDRESS →

6855 WEST 65TH ST
CHICAGO IL 60638

EPA Form 8700-12B (4-80)

09/28/81

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	I	L	D	0	0	0	8	2	1	4	6	2	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U044	U048	U050	U052	U056	U063
37	38	39	40	41	42
U069	U077	U080	U088	U091	U102
43	44	45	46	47	48
U107	U112	U117	U120	U122	U123

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
N. T. LaPlaca	N. T. LaPlaca, Plant Manager	8/14/80

EPA Form 8700-12 (6-80) REVERSE

AUG 18 1980

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	I	L	D	0	0	0	8	2	1	4	6	2	1
1	2									13		14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

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C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U134	U135	U138	U140	U144	U151
37	38	39	40	41	42
U154	U159	U161	U165	U169	U170
43	44	45	46	47	48
U171	U188	U196	U197	U201	U211

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

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SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
N. T. LaPlaca	N. T. LaPlaca, Plant Manager	8/14/80

EPA Form 8700-12 (6-80) REVERSE

AUG 18 1980

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	I	L	D	0	0	0	8	2	1	4	6	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

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13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U213	U220	U226	U239		
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

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☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
N. T. LaPlaca	N. T. LaPlaca, Plant Manager	8/14/80

EPA Form 8700-12 (6-80) REVERSE

AUG 18 1980

VISKASE CORPORATION

ILD000821462

January 27, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. L. W. Eastep, P.E.
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Re: Transfer of RCRA Interim Status from Union Carbide Corporation to Viskase Corporation

Dear Mr. Eastep:

On January 31, 1986, Viskase Corporation will complete the purchase of the Films - Packaging Division of Union Carbide Corporation. Included in that sale are the manufacturing facilities located at 6733 and 6855 West 65th Street, Bedford Park, Illinois.

In November, 1980, Union Carbide acquired interim status under the Resource Conservation and Recovery Act ("RCRA") by filing RCRA Part A Interim Status Applications with respect to the storage of hazardous wastes in containers at its "East Plant" (USEPA I.D. No. ILD005152954) and its "West Plant" (USEPA I.D. No. ILD000821462). (The East Plant and West Plant are hereafter together referred to as the "Bedford Park" plant). GTRTSD PA GTSD PAA

Enclosed please find amended RCRA Part A Interim Status applications to reflect that, effective January 31, 1986, Viskase Corporation will become the new owner and operator of the hazardous waste storage facilities located at the Bedford Park plant, with respect to which Union Carbide has previously acquired interim status. No changes in the operation of the plant with respect to hazardous waste management activities will occur.

Original submitted to IEPA for processing 3/86

In the event that the 90-day notice requirement of 35 Ill.Adm.Code S703.155 is applicable to the transfer of interim status from Union Carbide Corporation to Viskase Corporation, this letter will serve as a request for a waiver of that requirement. The parties to the purchase agreement did not have knowledge of the completion of this transaction 90 days in advance.

Very truly yours,

VISKASE CORPORATION

By _____
Plant Manager

NTL:po
1560K

Att.

CC: USEPA Region V
Permit Section
RCRA Activities
(CERTIFIED MAIL - RETURN RECEIPT REQUESTED)

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F [illegible] 3 D

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

ILD005152954
ILD000821462

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: UNION CARBIDE CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 RUCKER ROBERT ENVIR. COORD.	312 496 4873

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 6855 WEST 65TH STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CHICAGO	IL	60638

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 6855 WEST 65TH STREET

B. COUNTY NAME

COOK

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 BEDFORD PARK	IL	60638	031

NOV 17 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3079 (specify) Misc. Plastics Products	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: UNION CARBIDE CORPORATION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P

D. PHONE (area code & no.): A 312 496 4200

E. STREET OR P.O. BOX: 6855 WEST 65TH STREET

F. CITY OR TOWN: CHICAGO

G. STATE: IL

H. ZIP CODE: 60638

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)	
9 N — NA	9 P — NA	
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	
9 U — NA	9 Z — 0302186 0	(specify) Ill. and Bedford Park Air Discharge Permit
C. RCRA (Hazardous Wastes)	E. OTHER (specify)	
9 R — NA	9 Z — 991577	(specify) (for air discharge) County Certif. of Operation

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturing of food casing

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
C. J. Brounstein Vice President, Operations	C J Brounstein	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

C

18

Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F ~~ILDØØ5152954~~ 3 1

ILDØØØ821462

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8	47	Ø1	Ø1

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
~~X-1~~	~~S 0 2~~	~~600~~	~~G~~		5				
~~X-2~~	~~T 0 3~~	~~20~~	~~E~~		6				
1	S Ø 1	1250ØØØ	G		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): W ILD005152954 T/A 3 C 1

FOR OFFICIAL USE ONLY: W DUP T/A 3 C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F002	1,000 ϕϕϕ	P	S01	
2	D001				Included with above
3	D001	22,000 ϕϕϕ	P	S01	
4	F001	5,500 ϕϕϕ	P	S01	
4	F002				Included with above
6	F003	1,000 ϕϕϕ	P	S01	
6	F005				Included with above
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
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19					
20					
21					
22					
23					
24					
25					
26					

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F ILD000515294 T/A 3 C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 46 31 N	087 47 30 W

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
C. J. Brounstein Vice President, Operations	C J Brounstein	11/17/80

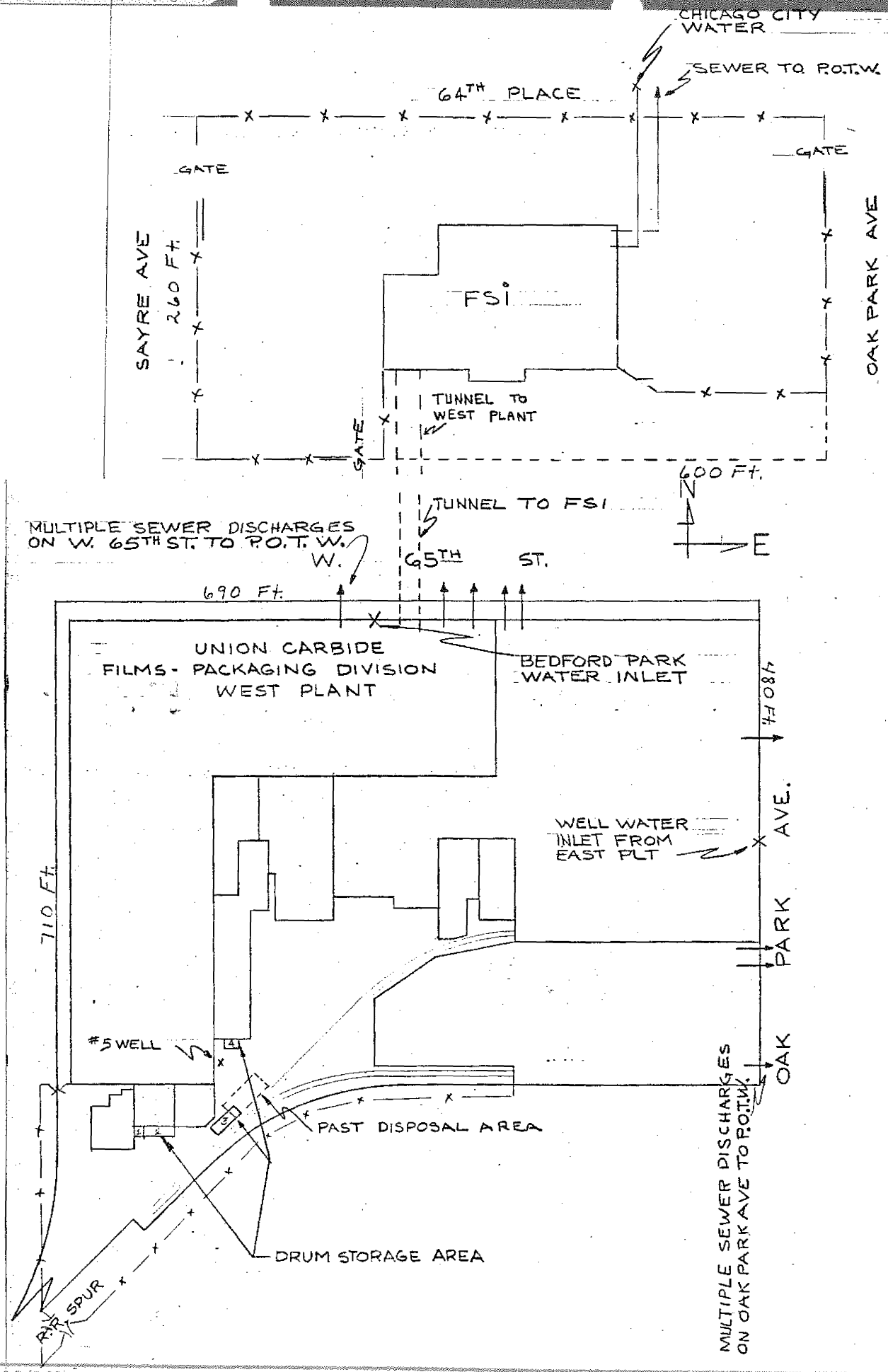
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING (see page 4)



X. EXISTING ENVIRONMENTAL PERMITS

782273 Illinois Special Waste Disposal

782271 Illinois Special Waste Disposal

78

UNION CARBIDE CORPORATION
FILMS – PACKAGING DIVISION
6733 WEST 65TH STREET, CHICAGO, ILLINOIS 60638

November 17, 1980

EPA REGION V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Re: RCAA, Part A Applications

Dear Sir:

Please find enclosed two RCRA Part A Hazardous Waste Permit Applications for Union Carbide's Bedford Park facilities. I.D. No. ILD005152954 applies to 6733 W. 65th Street; no I.D. was received for our facility at 6855 W. 65th Street. Numerous telephone calls were made to EPA even as late as Saturday November 15th without obtaining a number.

Because the regulations are unclear, and EPA has not issued regulative interpretations, certain activities have been included in our permit application (ILD005152954) to protect our position even though we feel they are not regulated under RCRA and do not require permitting.

Specifically, we have included neutralization activities which occur within our sewer system both incidental to our process and controlled (pretreatment). We strongly feel that neutralization within our sewer system represents a "totally enclosed treatment system" for purposes of RCRA regulation even though the sewer is vented to our process air discharge stack, and therefore this activity is exempt from regulation in accordance with § 265.1 (c) (9).

Furthermore, it is our understanding that EPA plans to issue an amendment to the regulation which will permit by rule certain treatment facilities including pretreatment.

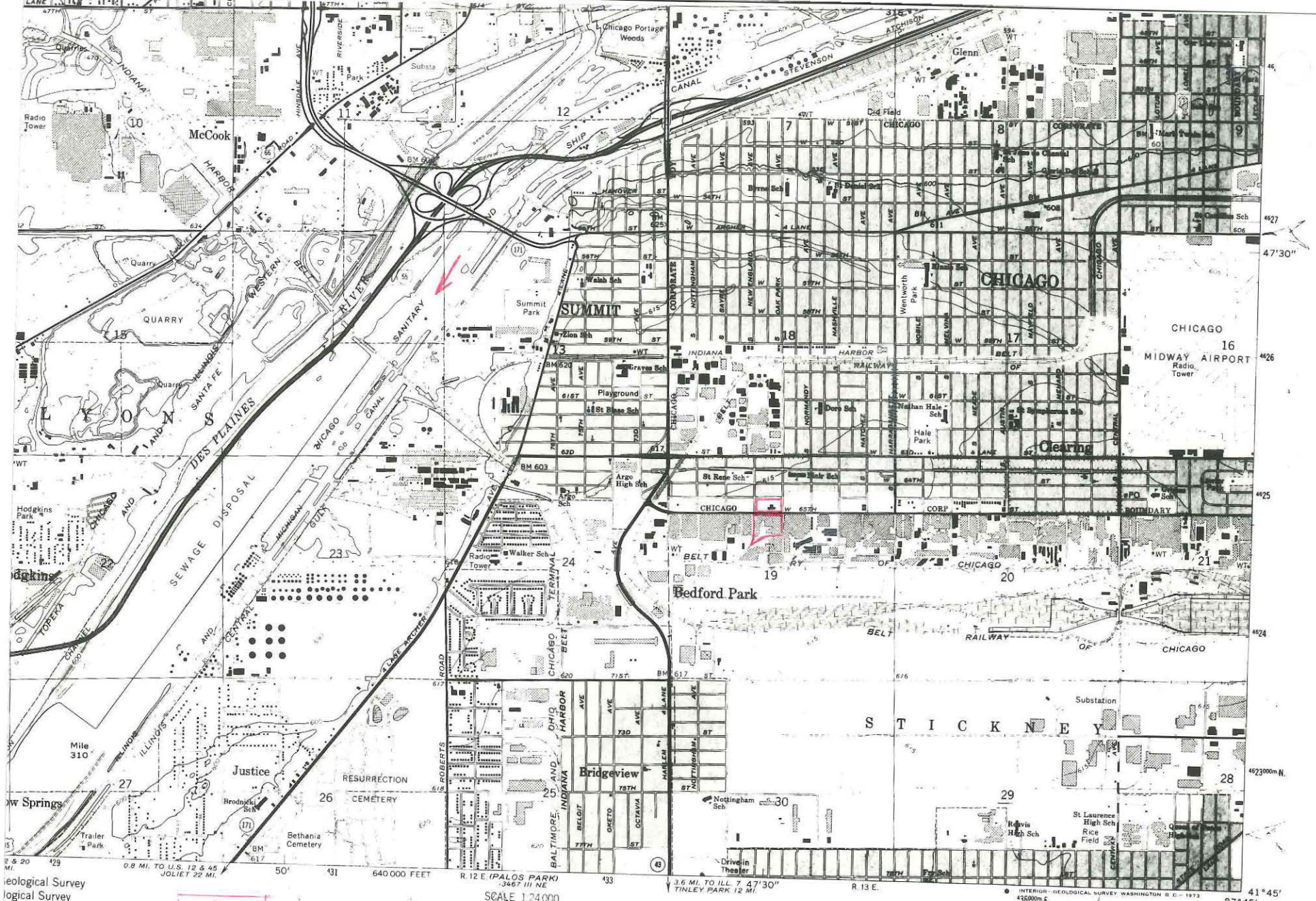
We therefore reserve the right to modify our application in accordance with any further interpretations on "totally enclosed treatment facilities" and any future amendments relative to pretreatment.

Very Sincerely,

Robert C. Odewald
Division Environmental Coordinator
312/496-4640

Attachments: EPA Forms 1 and 3 - ILD005152954
EPA Forms 1 and 3 - no EPA I.D. received
(6855 W. 65th Street, Bedford Park, Ill)

cc: C. J. Brounstein, Vice President, Operations
N. T. LaPlaca, Plant Manager



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aerial photographs
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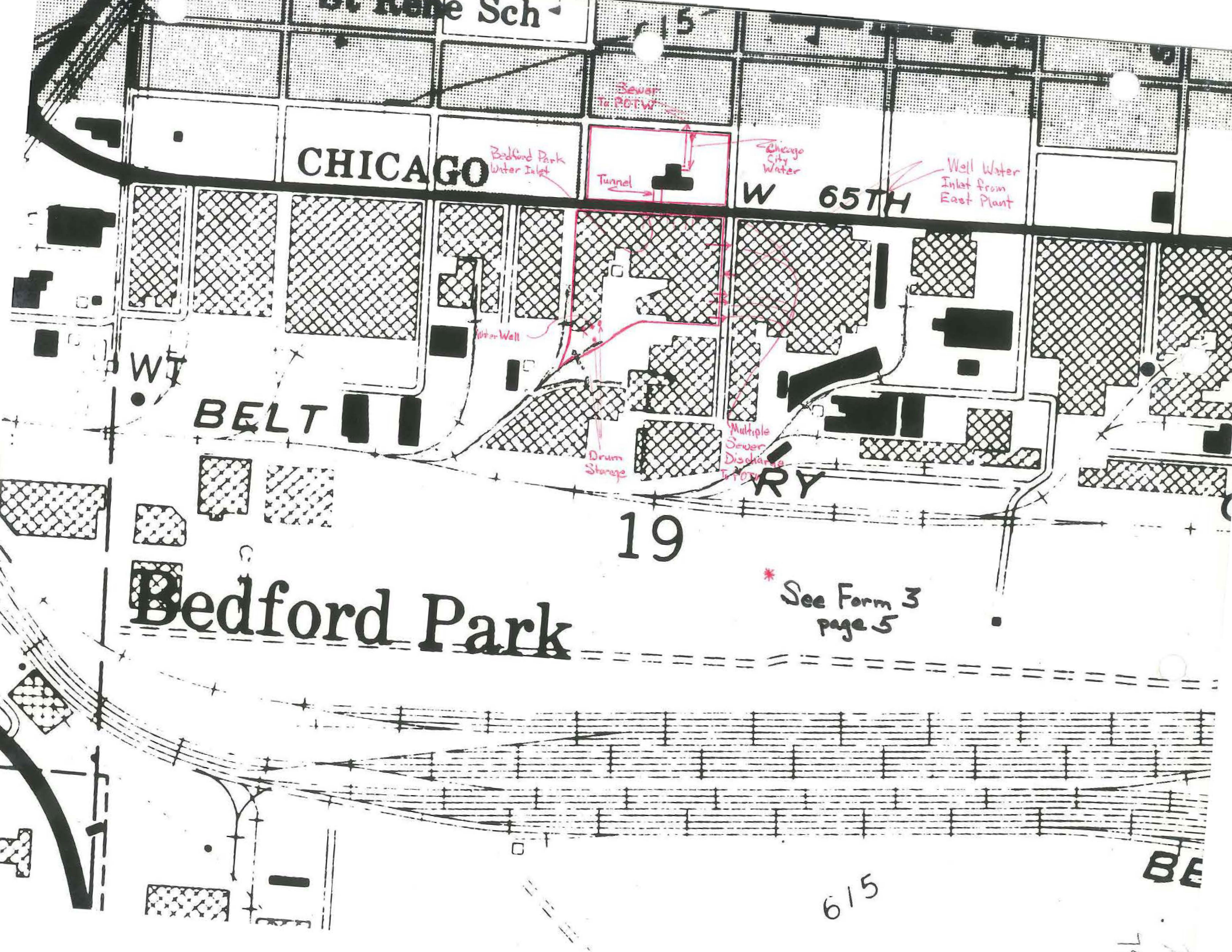
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

*See Enlargement

BERWYN, ILL.
N4145—W8745/7.5

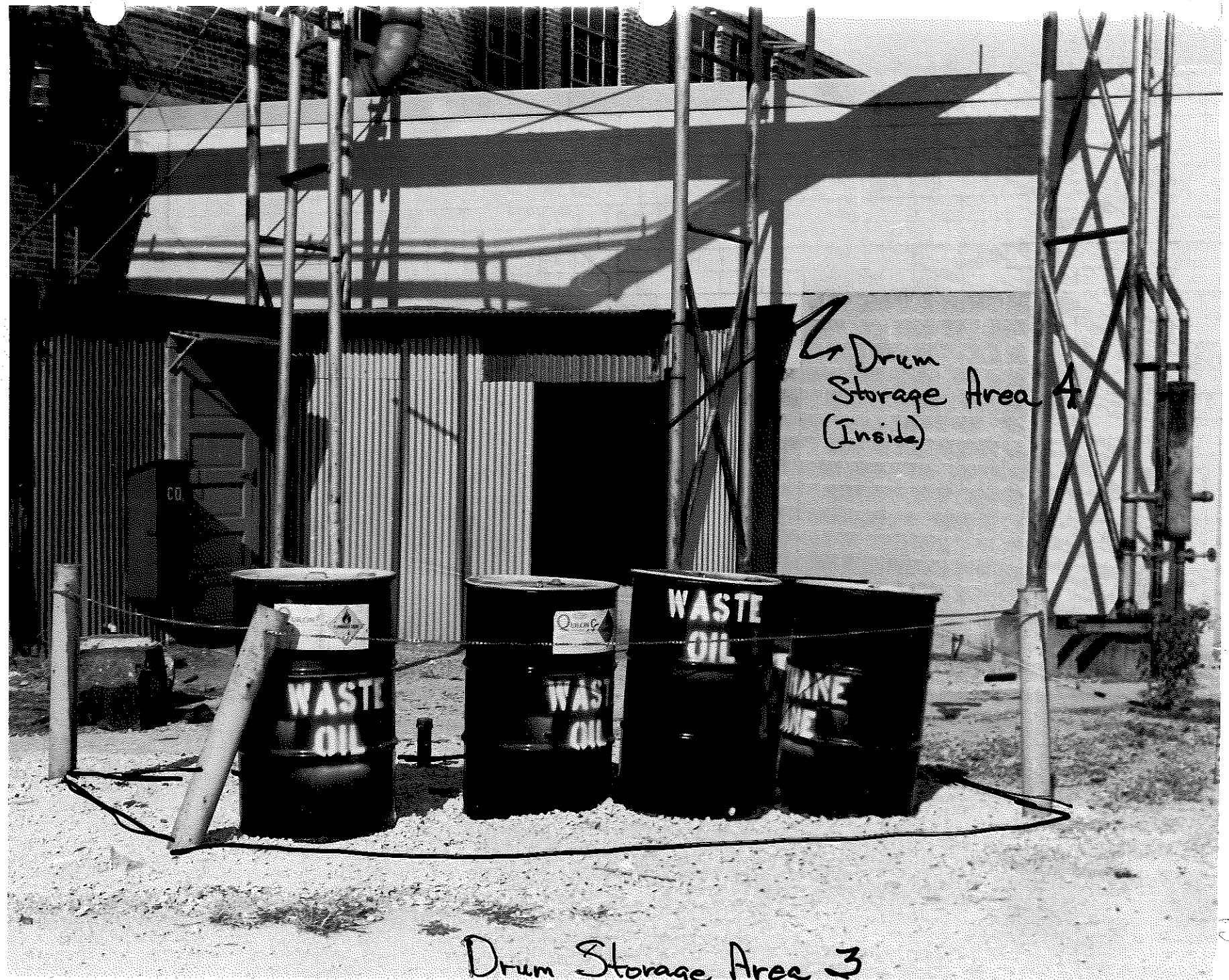
1963
PHOTOREVISED 1972
AMS 3467 IV SE—SERIES V863

ALD005529574


Sch
15
Sewer To POTW
CHICAGO
Bedford Park Water Inlet
Tunnel
Chicago City Water
Well Water Inlet from East Plant
W 65TH
Water Well
WI
BELT
Drum Storage
Multiple Sewer Discharge To POTW
RY
19
Bedford Park
* See Form 3 page 5
615

Drum Storage Area 1

Drum Storage Area 2
(Inside)



Drum Storage Area 3

Drum Storage Area 4
Inside

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

5

FORM 3 RCRA

EPA

ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S F

FOR OFFICIAL USE ONLY

APPLICATION APPROVED | DATE RECEIVED (yr., mo., & day) | COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C | 8 | 4 7 | YR. | MO. | DAY

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C | DUP | T/A | C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	1250	G	
2				
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before complet... ..ou have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	T/A C	FOR OFFICIAL USE ONLY	T/A C	
W	1	W DUP	2	DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F002	1,000	P	S01	
2	D001				Included with above
3	D001	22,000	P	S01	
4	F001	5,500	P	S01	
5	F002				Included with above
6	F003	1,000	P	S01	
7	F005				Included with above
8					
9					
10					
11					
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EPA Form 3510-3 (6-80)

CONTINUE ON REVERS

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F | | | | | | | | | | | | 16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 46 31 N	087 47 30 W

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

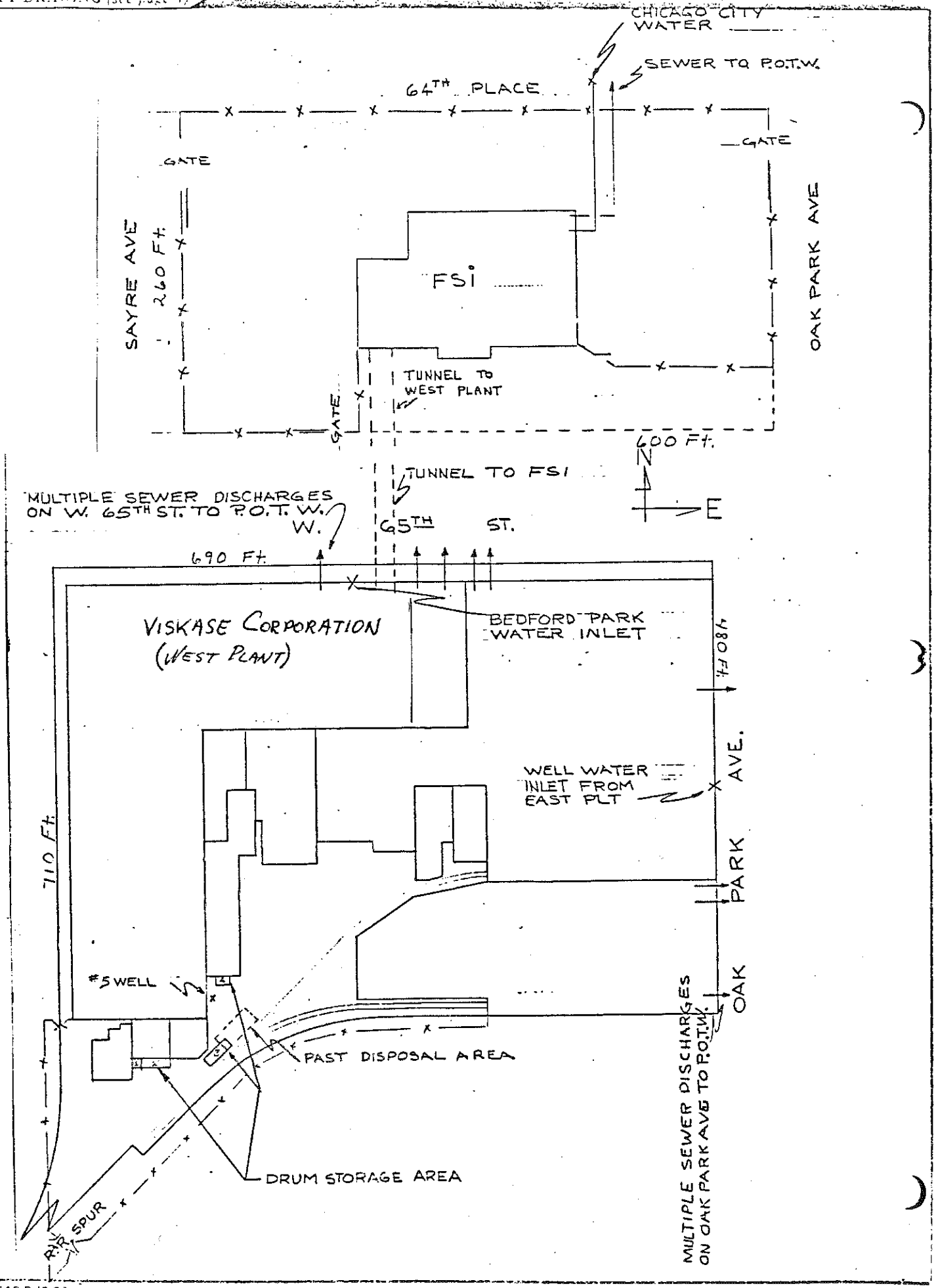
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
N. T. LaPlaca, Plant Manager	N. T. LaPlaca	1/29/86

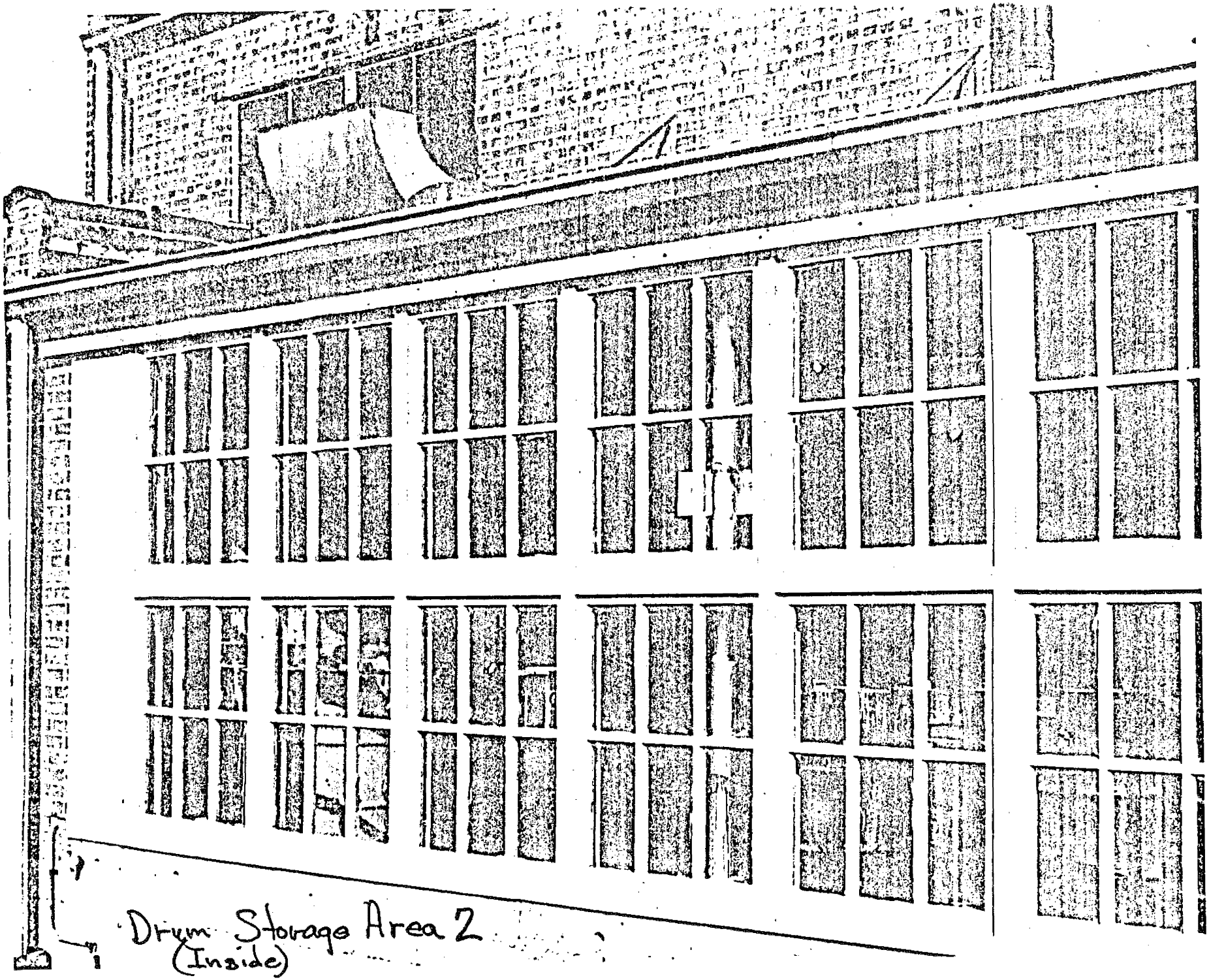
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

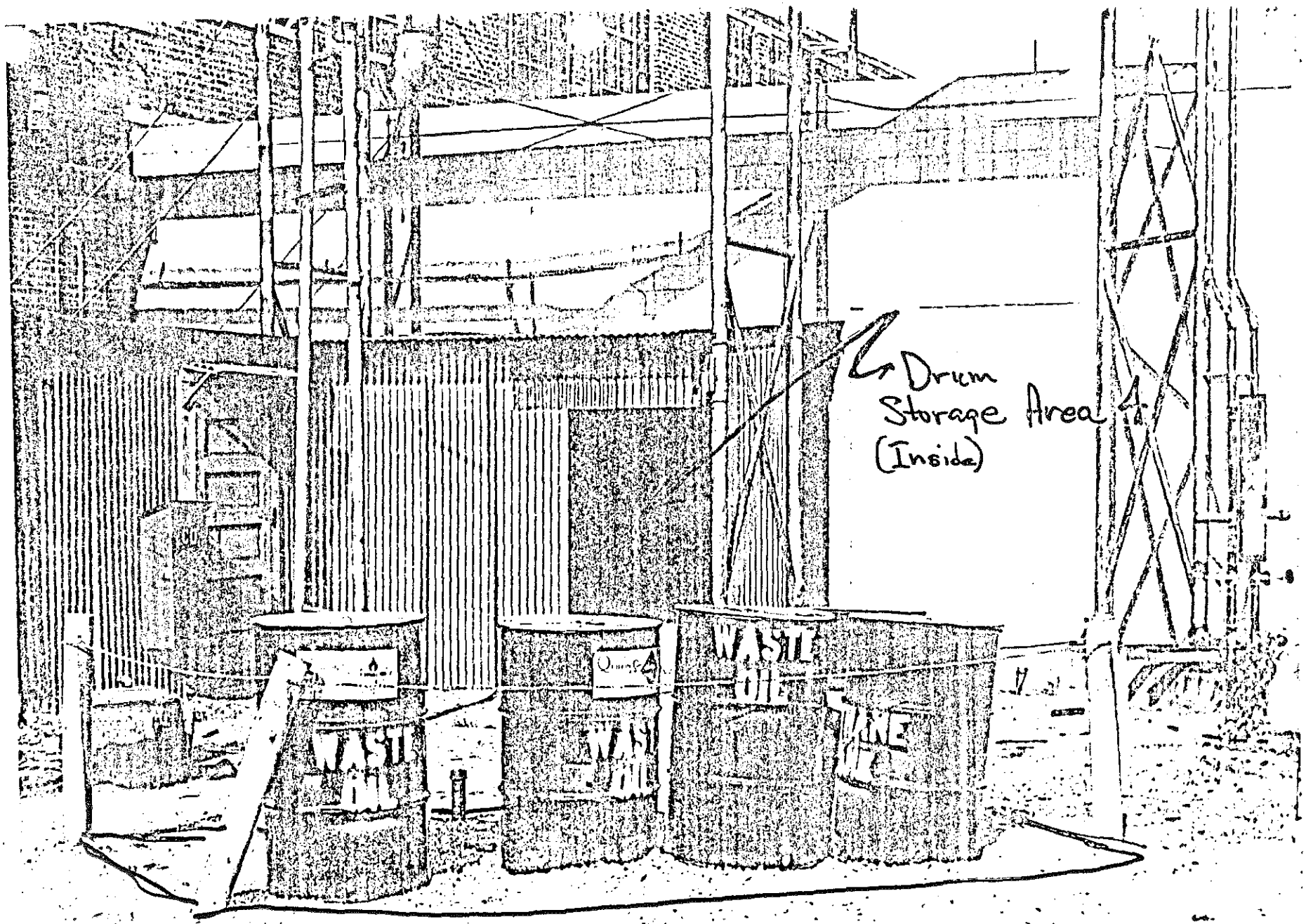
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED


CHICAGO CITY WATER
SEWER TO P.O.T.W.
64TH PLACE
GATE
GATE
SAYRE AVE
260 Ft.
OAK PARK AVE
FSI
TUNNEL TO WEST PLANT
GATE
600 Ft.
N
E
TUNNEL TO FSI
MULTIPLE SEWER DISCHARGES ON W. 65TH ST. TO P.O.T.W.
65TH ST.
690 Ft.
VISKASE CORPORATION (WEST PLANT)
BEDFORD PARK WATER INLET
480 Ft.
WELL WATER INLET FROM EAST PLT
AVE.
PARK
OAK
710 Ft.
#5 WELL
PAST DISPOSAL AREA
DRUM STORAGE AREA
R.R. SPUR
MULTIPLE SEWER DISCHARGES ON OAK PARK AVE TO P.O.T.W.

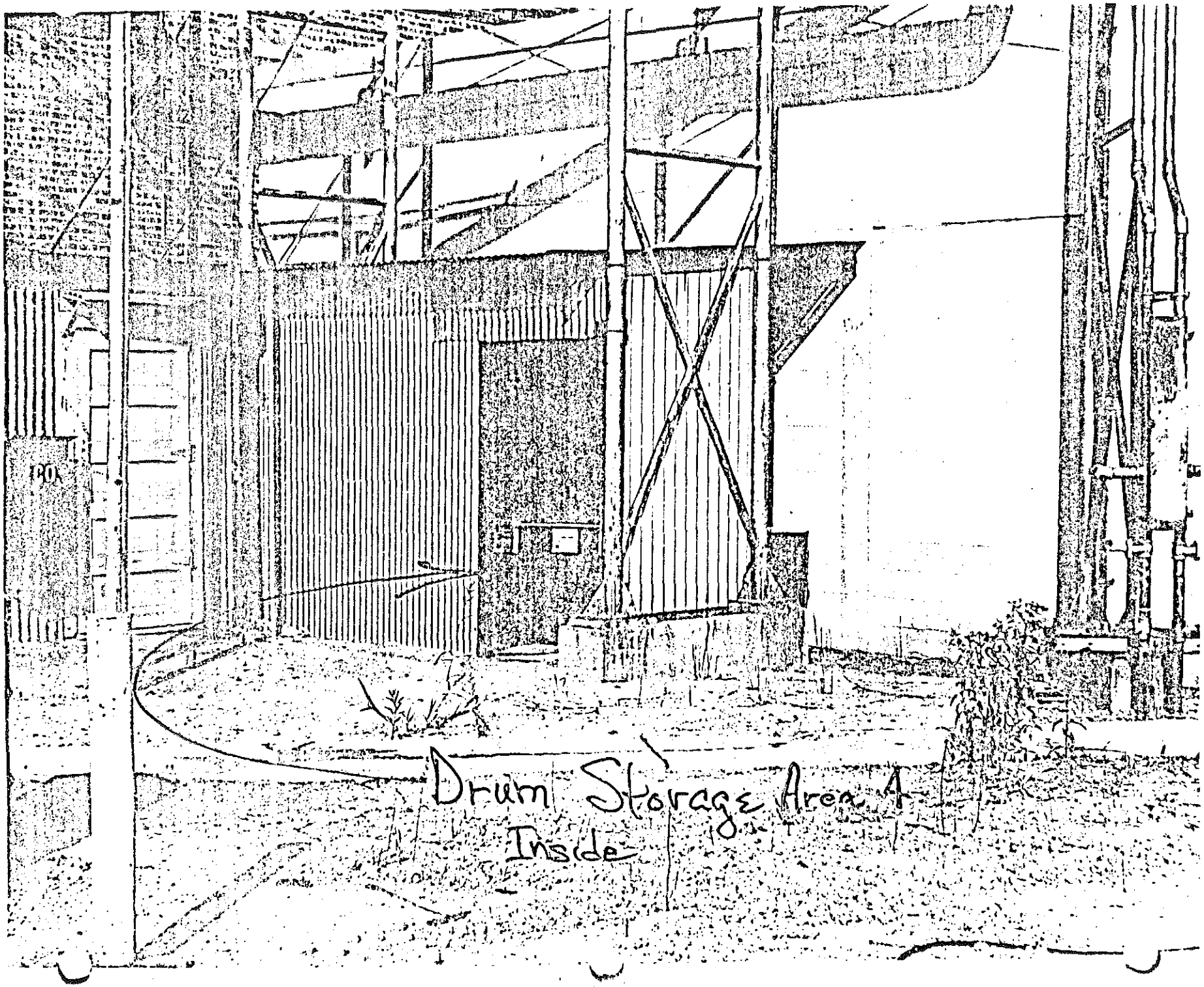
Drum Storage Area 1



Drum Storage Area 2
(Inside)



Drum Storage Area 3



Drum Storage Area A
Inside

Please print or type in the unshaded a (fill-in areas are spaced for elite type, characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: VISKASE CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 BORSUK EDWARD ENVIR. COORD.	312 496 4873

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 6855 WEST 65TH STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CHICAGO	IL	60638

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 6855 WEST 65TH STREET

B. COUNTY NAME

COOK

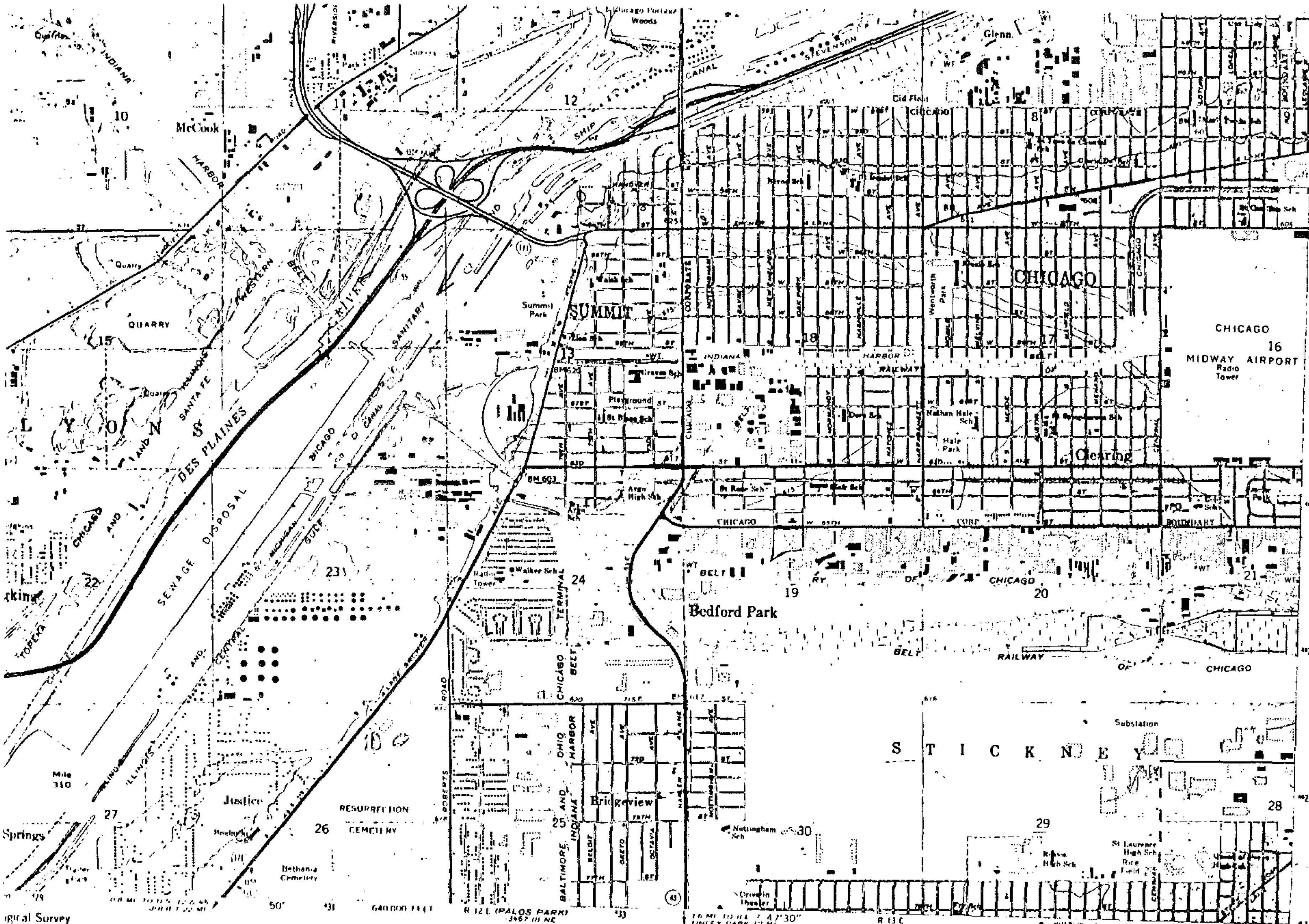
C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 BEDFORD PARK	IL	60638	

CONTINUE ON REVERS

X. EXISTING ENVIRONMENTAL PERMITS

782273 Illinois Special Waste Disposal

782271 Illinois Special Waste Disposal



ogical Survey
al Survey
y Department

al photographs
s 1925. Revised 1963

SCALE 1:24 000

CONTOUR INTERVAL 5 FEET

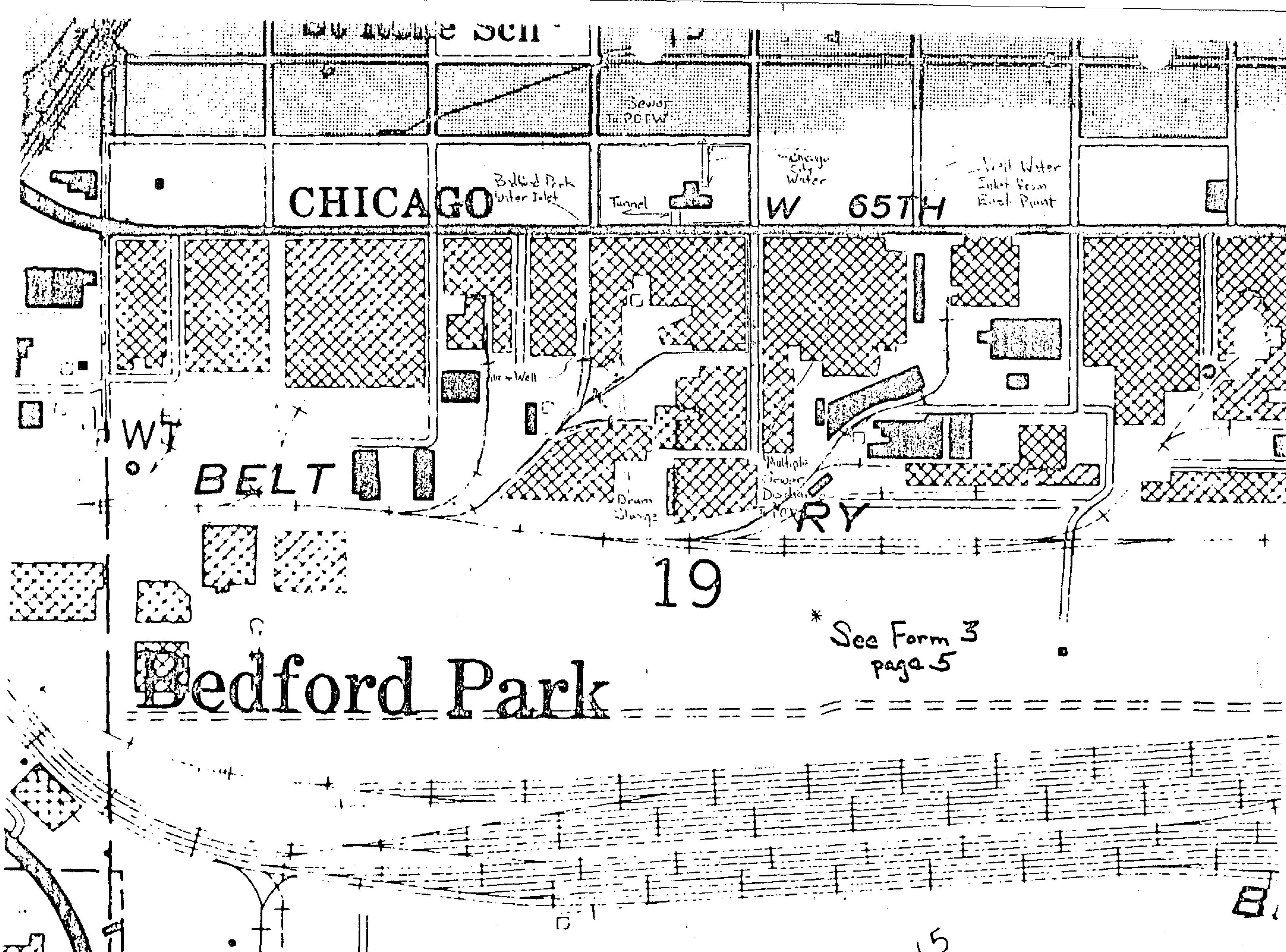
ROAD CLASSIFICATION
Heavy duty — Light duty
Medium duty — Unimproved dirt
Interstate Route — U. S. Route — State Route

ILLINOIS
QUADRANGLE LOCATION

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U S GEOLOGICAL SURVEY WASHINGTON D C 20242
AND BY THE STATE GEOLOGICAL SURVEY URBANA ILLINOIS 61801
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

*See Enlargement

BERWYN, ILL.
N4145—W8745/7.5
1963
PHOTOREVISED 1973


CHICAGO
W 65TH
Sewer To P.O.T.W.
Chicago City Water
Bedford Park Water Inlet
Tunnel
Well Water Inlet from East Plant
Water Well
Multiple Sewer Discharge
Drum Storage
WT
BELT
RY
19
Bedford Park
* See Form 3 page 5

A.4 Closure/ Post-Closure

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

T Marrel

March 3, 1994

Viskase Corporation
Attn: Mr. Steve E. Foli
6733 West 65th Street
Chicago, Illinois 60638

Re: 0310120009 -- Cook County
Viskase Corporation (West Plant)
ILD000821462
Log No: C-659
Date Received: December 17, 1993
RCRA - Closure

Dear Mr. Foli:

This is in response to the certification of closure submitted by Viskase Corporation for the two hazardous waste container storage units at the above referenced facility. This certification, signed by a representative of the owner/operator, S. F. Foli, Plant Manager, and an independent registered professional engineer, Kurt Chirbas, P.E., indicated that the two hazardous waste container storage units at the above-referenced facility had been closed in accordance with the plan approved by the Agency on March 26, 1993. These two units were known as Areas 2 and 4. Areas 1 and 3 were withdrawn from the Part A application in accordance with the Agency's March 26, 1993 closure plan approval letter.

The subject hazardous waste management units were inspected by a representative of this Agency on January 28, 1994. The inspection revealed that the units were closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the units were closed in accordance with the approved closure plan. Therefore, the Agency has determined that the closure of the two Hazardous Waste Container Storage Units at the above-referenced facility has apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management units:

1. The Agency has withdrawn your Part A application.

2. This facility must continue to meet the requirements of 35 IAC 722:Standards Applicable to Generators of Hazardous Waste and 35 IAC 728: Land Disposal Restrictions.

3. Further maintenance of certain financial assurance documents is no longer needed. Therefore, in accordance with 35 IAC 725.243(h), the following documents are being returned herewith:

   a. Irrevocable Standby Letter of Credit No. C7118872;

   b. Irrevocable Standby Letter of Credit No. C7146719; and

   c. Trust Agreement (Trust Fund Number 58017872).

Should you have any questions regarding this matter, please contact Michael A. Heaton at 217/524-3312.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:mah
JKM
Attachments

cc: USEPA Region V -- Lorraine Kosik
Kurt Chirbas, P.E.

bcc: Bureau File
Maywood Region
Andy Vollmer
Jim Moore
Mike Heaton
Todd Marvel

Marsh & McLennan

Marsh & McLennan, Incorporated
1221 Avenue of the Americas
New York, New York 10020
Telephone 212 997-2000

February 27, 1986

To Whom it May Concern:

Re: Union Carbide Corporation
Pollution Liability Insurance

We are pleased to enclose a Hazardous Waste Facility Liability Certificate in accordance with EPA regulations.

This certificate replaces the certificate on file with American Motorists which expired January 1, 1986.

Sincerely,

MJF

Michael J. Fischer
Assistant Vice President

MJF/sp

O. WMD ✓
cc: RF (memo) express mail

Hazardous Waste Facility Certificate of Pollution Liability Insurance

1. Continental Insurance Company, (the "Insurer"), of 180 Maiden Lane, New York, New York 10038 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to Union Carbide Corporation, (the "Insured"), of Old Ridgebury Road, Danbury, CT 06817 in connection with the insured's obligation to demonstrate financial responsiblity under 40 CFR 264.147 or 265.147. The coverage applies at:

Location Name	Address	EPA I.D. #
Linde Division	Lake Road East Ashtabula, OH 44004	OHD-000821454
Films Packaging Division	Bedford Park, IL	ILD-005152954
Films Packaging Division	Bedford Park, IL	ILD-000821462
Linde Division	Duluth, MN	MND-022773725
Films Packaging Division	Kentland, IN	IND-000708545

For: sudden accidental occurrences.

The limits of liability are $1,000,000 each occurrence and $2,000,000 aggregate, exclusive of legal defense costs. The coverage is provided under policy number TBA, issued on 2/27/86. The effective date of said policy is 1/1/86.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of authorized representative of Insurer

John Tranzano
Assistant Vice President-Special Risk

Authorized Representative of Continental Insurance Company
180 Maiden Lane
New York, New York 10038

JUN 20 1989

5HR-12

Mr. Ed Borsuk
Viskase Corporation (West Plant)
6855 W. 65th Street
Bedford Park, Illinois 60638

Re: Land Disposal Restrictions
Viskase Corporation (West Plant)
ILD 000 821 462

Dear Mr. Borsuk:

On April 18, 1989, the Illinois Environmental Protection Agency (IEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California list wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Ms. Gertrud Matuschkovitz of my staff at (312) 353-7921.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

EV 6-20-89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	6/20/89	P.S.D. 6.20.89	

5HR-12:G. MATUSCHKOVITZ:ev:3-7928:06/19/89:DISK #3:PC FILENAME:BORSUK

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: VISKASE CORPORATION (WEST PLANT)

U.S. EPA I.D. No.: ILD000821462 (0310120009)

Street: 6855 W. 65th Street

City: Bedford Park State: IL Zip Code: 60638

Telephone: (312) 496-4873

Operator: VISKASE CORPORATION (West Plant)

Street: 6855 W. 65th Street

City: Bedford Park State: IL Zip Code: 60638

Telephone: (312) 496-4873

Owner: VISKASE CORPORATION

Street: 6733 W. 65th Street

City: Bedford Park State: IL Zip Code: 60638

Telephone: (312) 496-4873

Inspection Date: 4/17/89 Time: 9:30 am - 2:45 pm Weather Conditions: 70° SUNNY
4/19/89 1:00 pm - 3:30 pm

	Name	Affiliation	Telephone
Inspectors:	CAROL GRASTEN	IEPA	345-9780
Facility Representatives:	ED BORSUK		496-4873

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	X	X		
Transporter				
Treater				
Storer	X	X		
Disposer				

RECEIVED
JUN 5 1989
IEPA-DLPC

Revised 9-26-88

IL 532-1739
LPC 296 11/88

03102.0009
Viskase (West)
April 17 & 18, 1989

NARRATIVE

Viskase Corporation's West Plant generates and stores hazardous waste. They provide the finishing operations for the East Plant. The East Plant manufactures casings for hot dogs and other meats. The West Plant receives semi-finished casings which are treated using various chemicals that enhance the properties of the casings. The West Plant manufactures plates of customer logo's. Most of this facility consists of warehouse space. They formerly operated a printing operation which ceased the summer of 1988.

HAZARDOUS WASTES GENERATED

Perchlorethane, butanol - F002, F003 - Used wash out solution in plate manufacturing. The waste was last analyzed January 3, 1989. There were seven 30 gallon drums on site. 1530 gallons were generated in 1988. The last manifested shipment was January 18, 1989 and went to Arganic in Wisconsin.

Mineral Spirits - D001 - Generated in a parts washer. The parts washer is no longer in use. The waste was last analyzed September 12, 1986. 151 gallons were generated in 1988. The last manifested shipment was July 11, 1988 and went to Safety-Kleen.

1 Nitropropane (Waste Ink) - D001 - Formerly generated in the printing operation. It is no longer generated. There were seven drums on site. It was never sent off site. The waste determination was made using MSDS sheets. Prior to 1988, 2 Nitropropane (F005) was used.

Methelene Chloride - F002 - Generated during cleanup using a varnish remover. This waste is no longer generated. There was one drum on site. This waste was never sent off site. The waste determination was made using MSDS sheets.

NON-HAZARDOUS WASTE GENERATED

Waste Oil - From hydraulic oils, gear boxes and machine maintenance. It was last analyzed March 4, 1987. It is sent to EWR for fuel blending. The last manifested shipment was June 17, 1988. The rate of generation varies.

HAZARDOUS WASTE UNITS

S01 - Storage in Containers - There are two S01 units in the West Plant.

1 - "Solvent Vault" located on a concrete floor in a locked "vault" connected to the former painting operation. 1 Nitropropane is stored in this area.

2 - Located outside of the plant. One drum of Methelene Chloride is stored in a locked shed on a concrete floor.

APPARENT VIOLATIONS

There were no apparent violations.

CG:bh:3653B

There were no apparent Land Ban violations

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. **BDAT Treatability Group - Treatment Standards Identification**

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   X Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ___ Pharmaceutical wastewater containing spent methylene chloride
   X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   NONE OF THESE WASTES

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. **Waste Analysis**

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. KNOWLEDGE OF RAW MATERIAL AND PRODUCTION PROCESS/MSDS SHEET

- TCLP

____ Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA

If yes, specify the waste stream: Methylene Chloride

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

WASTE STREAM AND PROCESS HAS NOT CHANGED

N/A

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

_____

_____

_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

WIA

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

_____

_____

_____

C. <u>Management</u>

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

__X__ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

__X__ Yes ____ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

__X__ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	X Yes	____ No
Applicable treatment standards	X Yes	____ No
Manifest number	X Yes	____ No
Waste analysis data, if available	X Yes	____ No

Identify off-site treatment or storage facilities: AVGANIC EWR INCINERATOR

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes X No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No NA X

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes X No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No NA X

N/A

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u>

N/A

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

(iii) Waste analysis data, if available ____ Yes ____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes _X_ No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ___X___ Yes ____ No ____ NA

   o California List ____ Yes ____ No ___X___ NA

   o First Third ____ Yes ____ No ___X___ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ___X___ Yes ____ No

   a. What date was the waste analysis plan last revised? NOV 1986

   b. Are analyses conducted on-site or off-site?

      ___X___ On-site ___X___ Off-site

      Identify off-site lab: GULF COAST LABS

   c. Is F-solvent waste analyzed using TCLP?

      ____ Yes ___X___ No ____ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

      ____ Yes ____ No ___X___ NA

      Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: When processes change or operator has reason to believe waste stream has changed

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

X Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

X Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

X Yes ____ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: WAITING FOR ANALYSIS RESULTS / THIS OPERATION HAS BEEN SHUT DOWN, MORE METH. CHLORIDE MAY BE GENERATED AS A RESULT OF THE SHUT DOWN SO FACILITY WANTS TO SHIP ANY WASTE OFF-SITE AT THE SAME TIME

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

NO TANKS

____ Yes ____ No X NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

NO TREATMENT

C. <u>Treatment</u>

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. <u>Treatment in Surface Impoundments</u>

NO SURFACE IMPOUNDMENT

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

NO LAND DISPOSAL

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ____ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

   If yes, specify which units and what wastes each unit has received: _____

   _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

   _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

01 JUL 1988

Mr. Edward Borsuk
Viskase Corporation
West Plant
6855 W. 65th Street
Chicago, Illinois 60638

Re: Viskase Corporation
West Plant
ILD 000 821 462

Dear Mr. Borsuk:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on June 23, 1988. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our June 1, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

	CONCURRENCES							
SYMBOL								
SURNAME	O:R							
DATE	6/29/88	6/29/88		6-30-88				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

VISKASE

Viskase Corporation
6855 West 65th Street
Chicago, Illinois 60638

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 23, 1988

Mr. P. E. Dimock, Chief
IL/MI/WI Enforcement Section
U.S.EPA
Region 5
230 S. Dearborn St.
Chicago, Illinois 60604

Attention: 5HS-12 (West Plant)

Gentlemen:

This is in response to the above N.O.V. received 6/3/88.

Our failure to mark dates on all containers of F001-F005 Wastes entering storage has now been corrected. Attached is Documentation implementing this correction to our procedure.

As per the Field Report, failure to identify contents is not a deficiency.

Sincerely,

E. J. Borsuk

E. J. Borsuk
Health/Safety/Environmental Coordinator

EJB:atg
0892D
Attachments

VISKASE

Internal Correspondence

Viskase Corporation
6855 West 65th Street
Chicago, Illinois 60638

To Mr. D. L. Graybeal
Mr. C. J. Mackus

Date June 13, 1988

From Employee Relations

Copies Mr. N. T. LaPlaca
Mr. R. C. Odewald

Subject Hazardous Waste Identification and Updating Requirements

Land disposal restrictions for F001-F005 Waste Solvents became effective November 8, 1986 and required that drum contents be identified and that we "mark dates on all containers entering storage."

The attached procedure pertaining to the above should be implemented immediately.

E. J. Borsuk

E. J. Borsuk
Health/Safety/Environmental Coordinator

EJB:atg
Attachment

0893D

UPDATE

Procedure For Management of F001-F005 Waste Solvents

I. APPLICABILITY

WEST PLANT

1. Waste Cyrel; F002, F003
2. Waste Octastrip (Waste Methylene Chloride); F001, F002
3. Waste 1,1,1 - Trichloroethane; F001, F002

EAST PLANT

1. Waste Methylene Chloride Mixture; F002
   (Extraction Process)
2. Waste 1,1,1 - Trichloroethane; F001
   (Maintenance Degreasing)

II. LABELING

1. Continue labeling with hazardous waste label as before.
2. Begin immediately to add to the label the date containers entered storage.

III. COMPLIANCE/INSPECTION

1. The weekly RCRA Hazardous Waste Inspection Log currently requires verifying proper labeling (HW Labels on Drums, Waste Name and date entered storage on the label).

0892D

5HS-12

01 JUN 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Edward Borsuk
Environmental Coordinator
Viskase Corporation
West Plant
6855 W. 65th Street
Chicago, Illinois 60638

Re: Notice of Violation
Viskase Corporation
West Plant
ILD 000 821 462

Dear Borsuk:

On April 29, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

> Failure to identify contents and mark dates on all containers entering storage, as required by Section 268.50(a)(2)(i).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

...aff (5HS-12) 230 S. Dearborn, Chgo, IL 60604

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	Edward Borsuk
Street and No.	6855 W. 65th Street
P.O., State and ZIP Code	Chicago, IL 60638
Postage	$ .85
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.60
Postmark or Date	CHICAGO IL ... STA. JUN 1988

PS Form 3800, June 1985 U.S.G.P.O. 153-506

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. ↑*(Extra charge)*↑
2. ☐ Restricted Delivery ↑*(Extra charge)*↑

3. Article Addressed to: Mr. Edward Borsuk Environmental Coordinator VISKASE Corporation WEST Plant 6855 W. 65th Street Chicago, IL 60638	4. Article Number P-571 916 714 Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature – Addressee X Edward J. Borsuk	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature – Agent X	
7. Date of Delivery	

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

If you have any questions regarding this correspondence, please contact Ms. Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcements Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

	CONCURRENCES							
SYMBOL								
SURNAME	E.V.							
DATE	5/27/88	5/27/88	5/27/88					

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

P4866523846

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0310120009 -- Cook County
Viskase Corp.
ILD000821462
RCRA - Permits

May 6, 1988

Viskase Corp.
6855 W. 65th St.
Bedford Park, Illinois 60638

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:rd1313j/1314j

Enclosures

cc: Division File
Compliance
Maywood Region
USEPA Region V

Cook Co. F.O.S.

RECEIVED MAY 18 1988 SOLID WASTE BRANCH U.S. EPA, REGION V

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: VISKASE CORPORATION

U.S. EPA I.D. No.: ILD000821462 LPC # 0310120009

Street: 6855 W. 65th St.

City: CHICAGO State: ILLINOIS Zip Code: 60638

Telephone: 312/496-4200

Operator: VISKASE CORPORATION

Street: 6855 W. 65th St.

City: CHICAGO State: ILLINOIS Zip Code: 60638

Telephone: 312/496-4200

Owner: VISKASE CORPORATION

Street: 6855 W 65th St.

City: CHICAGO State: ILLINOIS Zip Code: 60638

Telephone: 312/496-4200

Inspection Date: 4/29/88 Time: 1:30pm-3:45pm Weather Conditions: SUNNY, 65°

	Name	Affiliation	Telephone
Inspectors:	TODD MARVEL	IEPA	312/345-9780

Facility Representatives: EDWARD BORSUK (ENV. COOR.)
NICK MAOLONI (CORP. ENV. ENG.)

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	✓	✓	
Transporter			
Treater			
Storer	✓	✓	
Disposer			

Revised 11-03-87

RECEIVED MAY 11 1988 IEPA/DLPC

INSPECTION SUMMARY

Viskase Corporation manufactures sausage casing and other meat packaging films. This location is divided into two plants: an east plant and a west plant. Each plant has its own USEPA identification number. This is the west plant. A semi-finished product is manufactured in the east plant and brought here to be finished. This plant generates and stores F-ban waste but does not handle California List waste.

Restricted Wastes Generated:

-Waste Methylene Chloride (F001/F002)
-Spent Cyrel Solvent (F002/F003)

All wastes are sent off-site for treatment or recycling.

Observed Deficiencies:

-Facility is not dating their drums of restricted waste upon entering storage.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	✓		✓		
2.	F002	✓		✓		
3.	F003	✓		✓		
4.	F004					
5.	F005					

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ✓ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, note how this is adequate: KNOWLEDGE OF RAW MATERIAL AND PRODUCTION PROCESSES

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: SPENT CYREL SOLVENT WASTE METHYLENE CHLORIDE

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

PROCESSES AND WASTE STREAMS HAVE NOT CHANGED.

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____
_____
_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____
_____
_____
_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

✓ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	____ Yes	✓ No NO TCLP PERFORMED

Identify off-site treatment or storage facilities: AVAILABLE INDUSTRIES (COTTAGE GROVE, WI.) AND ELWR INC. (COAL CITY, IL.)

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No ✓ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ✓ No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ✓ Yes ____ No ____ NA

   o California List ____ Yes ____ No ✓ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No

   a. What date was the waste analysis plan last revised? Nov. 1986

   b. Are analyses conducted on-site or off-site?

      ✓ On-site ✓ Off-site

      Identify off-site lab: Gulf Coast Labs, University Park, IL.

   c. Is F-solvent waste analyzed using TCLP?

      ____ Yes ✓ No ____ NA

   d. Describe the frequency of sampling: WHEN PROCESSES CHANGE OR OPERATOR HAS REASON TO BELIEVE WASTE STREAM HAS CHANGED

   e. Describe procedures used to identify manifest discrepancies:

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

   ✓ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

____ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ✓ No ____ NA

CONTENTS ARE IDENTIFIED BUT NO DATE ON DRUMS

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA
(EXCEPT FOR DATES)

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No _____ NA No tanks

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No _____ NA

C. Treatment

NA

1. Does the facility treat restricted wastes other than in surface impoundments?

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

_____ Yes _____ No

D. Corrective Action

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

VISKASE CORPORATION (WEST PLANT)
BEDFORD PARK, ILLINOIS
ILD 000 821 462

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 000 821 462
Date Prepared	:	April 22, 1992
Contract No.	:	68-W9-0006
PRC No.	:	109-R05032 IL12
Prepared by	:	B&V Waste Science & Technology Corp. Miguel A. Sanchez
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TABLE OF CONTENTS

EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Viskase Corporation West Plant facility in Bedford Park, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

Viskase Corporation manufactures sausage casings and other meat packaging films. Two separate facilities are situated within Bedford Park, Illinois: the West Plant and the East Plant. Each plant has its own USEPA identification number. The focus of this report is Viskase Corporation's West Plant. The West Plant provides the finishing operations for the semi-finished cellulose food casings manufactured in the East Plant. Various finishing alternatives, including ink making, printing, plate manufacturing, and off-line slugging, have been performed in the West Plant. Only off-line slugging was on-going at the time of the VSI. Facility operations at this location have remained dedicated to the packaging films industry since the plant start-up in 1947. The facility covers approximately 8.3 acres and employs approximately 600 people.

The following waste streams are currently generated in the West Plant: mineral spirits (D001) from the degreasing and clean-up of maintenance parts and machinery, and waste oil from the maintenance of gear boxes and mechanical equipment. Waste streams generated from previous operations include waste cyrel solvent (F002, F003), 1-Nitropropane (D001), 2-Nitropropane (F005), waste Methylene Chloride (F002), and waste 1,1,1-Trichloroethane (F001, F002). All wastes are placed in drums. The first RCRA Part A permit application was filed in 1980 by Union Carbide Corporation. An amended Part A permit application was submitted by Viskase Corporation in 1986 to reflect the change of ownership. The West Plant is currently operating under RCRA interim status and is regulated as a generator and storer of hazardous waste. A RCRA Part B permit application has never been submitted. Plans are currently being formulated for the closure of all the existing hazardous waste storage units at this location and the facility is proposing to become a small quantity generator.

The PA/VSI identified the following 4 SWMUs and 1 AOC at the facility:

Solid Waste Management Units

1. Drum Storage Area
2. Drum Storage "Solvent Vault"
3. Drum Storage Area
4. Drum Storage Shed

Area of Concern

1. Former Underground Storage Tank Area

All four SWMUs at this facility are designated storage areas where drummed wastes are placed prior to disposition off site. They were all identified as such in the initial and amended Part A permit applications.

The potential for release to the air, soil, groundwater, or surface water from SWMUs currently operating (SWMUs 2 and 4) is low. These SWMUs have a concrete floor, are totally or partially enclosed, and all wastes are drummed before being stored there. There are no reported releases from SWMUs 2 and 4.

SWMU 1 has not been used for the storage of any type of waste since Viskase Corporation became the owner and operator of the West Plant facility in 1986. It was designated as a "drum storage area" in the initial and amended Part A permit applications to insure that sufficient space was allotted for the storage of wastes, but its use as such has not been necessary. There are no known releases from this SWMU, and there is no potential for future releases from this SWMU since it is inactive.

SWMU 3 also has a low potential for release to all media. It is located outdoors and has an unpaved, graveled floor, but only non-hazardous drummed wastes were stored there. There are no known releases from this SWMU, and its use as a waste handling unit is now discontinued.

The only AOC identified is the area where two underground solvent storage tanks were previously located. These tanks had been out of service prior to 1974 and were decontaminated and removed in 1988. However, no soil or groundwater testing was ever done to check for contamination. There is a possibility that hazardous substances remain there.

Receptors of potential releases at the facility include Viskase Corporation employees, surrounding industry personnel, and nearby residents. The facility is surrounded by other industries on all sides except to the north. The nearest residence is approximately 400 feet to the north of the facility. Access to the facility by potential receptors is limited by fencing, a 24 hour security guard service, and control of access points. In addition, SWMU 2 is kept locked at all times.

There are no sensitive environments in the vicinity. The closest surface water is the Chicago Sanitary and Ship Canal, located approximately 2 miles to the north and west of the facility; its principal use is for transportation. A well is located in the southwest side of the West Plant. Two other wells are located within the East Plant, which is approximately 200 ft. east of the West Plant. The water obtained from these wells is used as cooling and process water. No groundwater monitoring system is employed for these wells. Drinking water for employees at the facility and nearby residents is obtained from Lake Michigan, which is over 10 miles east of the facility.

No facility soil contamination has been identified. Concrete pads in the two active SWMUs limit the possibility of a release to the soil.

This facility presently poses a low threat of release via migration pathways. Sound containment, the small volume of wastes handled, and proper waste management practices limit the possibility of future releases. The closure of the hazardous waste storage units at this facility will further reduce the possibility of a release.

1.0 INTRODUCTION

PRC Environmental Management, Inc., received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. As a team member with PRC under the TES 9 contract, B&V Waste Science and Technology Corp. (BVWST) conducted the PA/VSI for the Viskase West Plant facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Viskase Corporation West Plant facility in Bedford Park, Illinois. The PA was completed on August 5, 1991. BVWST gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. The VSI was conducted on August 6, 1991. The VSI of the Viskase Corporation East Plant facility was conducted on the same day. A separate report has been compiled to document the results of the PA/VSI for the East Plant. The VSI included interviews with Viskase Corporation facility representatives and a walk-through inspection of both the East and West Plant facilities. Four SWMUs and one AOC were identified at the West Plant facility.

The VSI is summarized and four inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

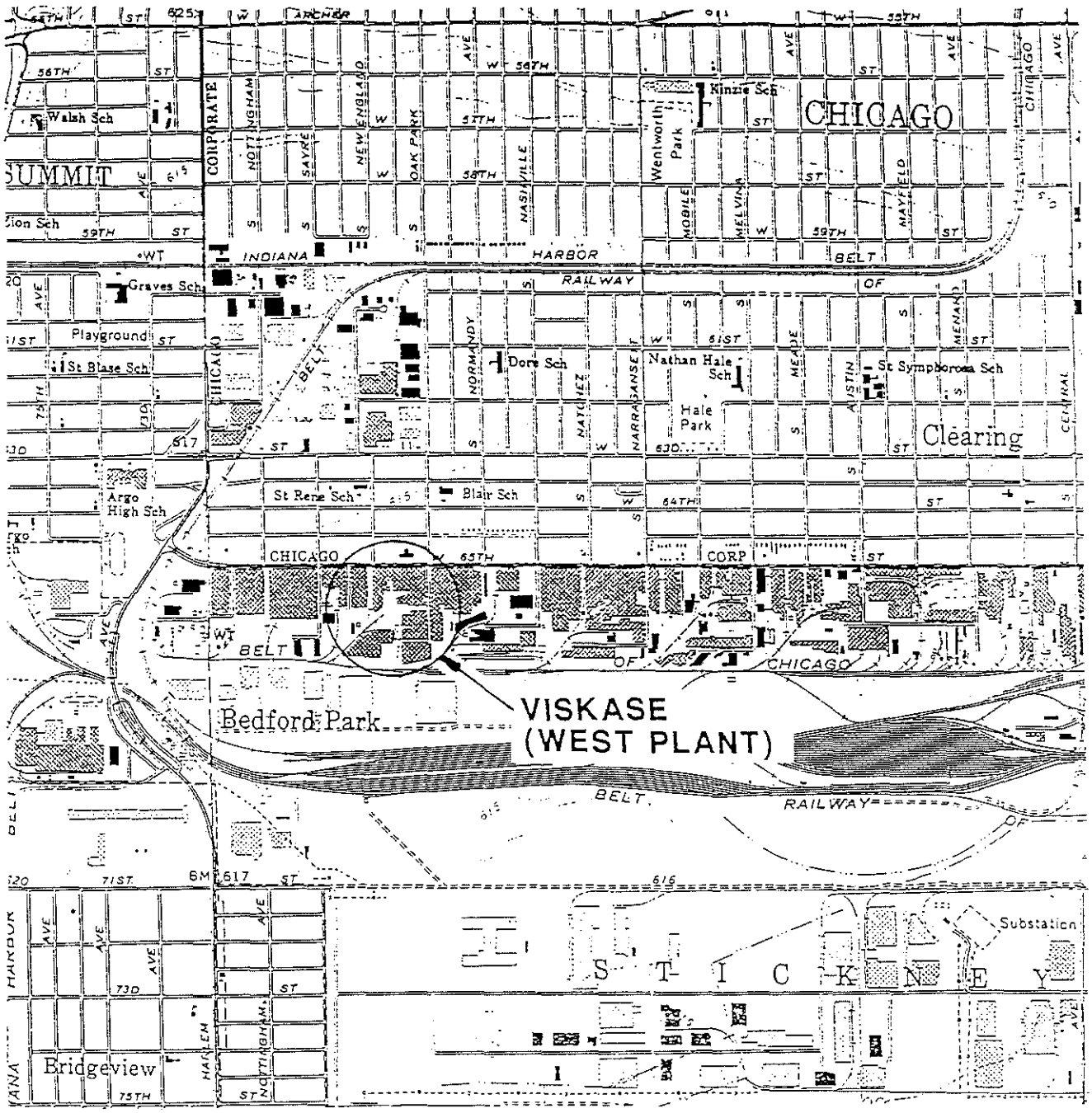
2.1 FACILITY LOCATION

Viskase Corporation's West Plant is located at 6855 W. 65th Street in Bedford Park, Cook County, Illinois; Township 38 North, Range 13 East, Section 19; latitude 41°46'31" and longitude 87°47'30" (see Figure 1). Bedford Park is a western suburb of the city of Chicago, in northeastern Illinois. The facility occupies 8.3 acres of an industrial park.

The West Plant is bordered on the east, south, and west sides by an industrial park. Oak Park Avenue runs adjacent to the east edge of the facility; 65th Street along the north edge. The Food Science Institute (FSI) is located across 65th Street. It is a product testing and teaching facility owned by Viskase Corporation, but it is not considered a part of the West Plant facility. There is also residential area to the north of the facility, behind FSI. This area and FSI are part of the City of Chicago. Blair School and St. Rene School are located approximately 1,000 ft. away.

2.2 FACILITY OPERATIONS

Viskase Corporation manufactures food casings and other meat packaging films. More specifically, the role of the West Plant is to provide the finishing operations for the semi-finished cellose food casings manufactured in the East Plant. The only casing finishing operation currently being performed is off-line slugging. This consists of putting a reeled casing (produced in the East Plant) through a machine which unreels it, passes a slug of liquid through the inside of the casing, and then re-reels it. This process is done to provide an internal coating on the casing. Prior to 1989, ink making and printing operations were also performed. The ink making was necessary for the printing operation, and involved the blending of inks of different colors. The printing operation was executed to label the casing products with customer logos and a description of the product. Two kinds of printing presses were used: rotary and flexographic. In order to use the printing presses, plates of customer logos and product descriptions had to be manufactured. These photographic plates were created by the graphics department.



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

QUADRANGLE LOCATION

BERWYN QUADRANGLE
ILLINOIS - COOK CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
N4145 - W8745/7.5

SOURCE: U.S.G.S.

VISKASE CORPORATION
WEST PLANT
BEDFORD PARK, ILLINOIS

PA/VSI

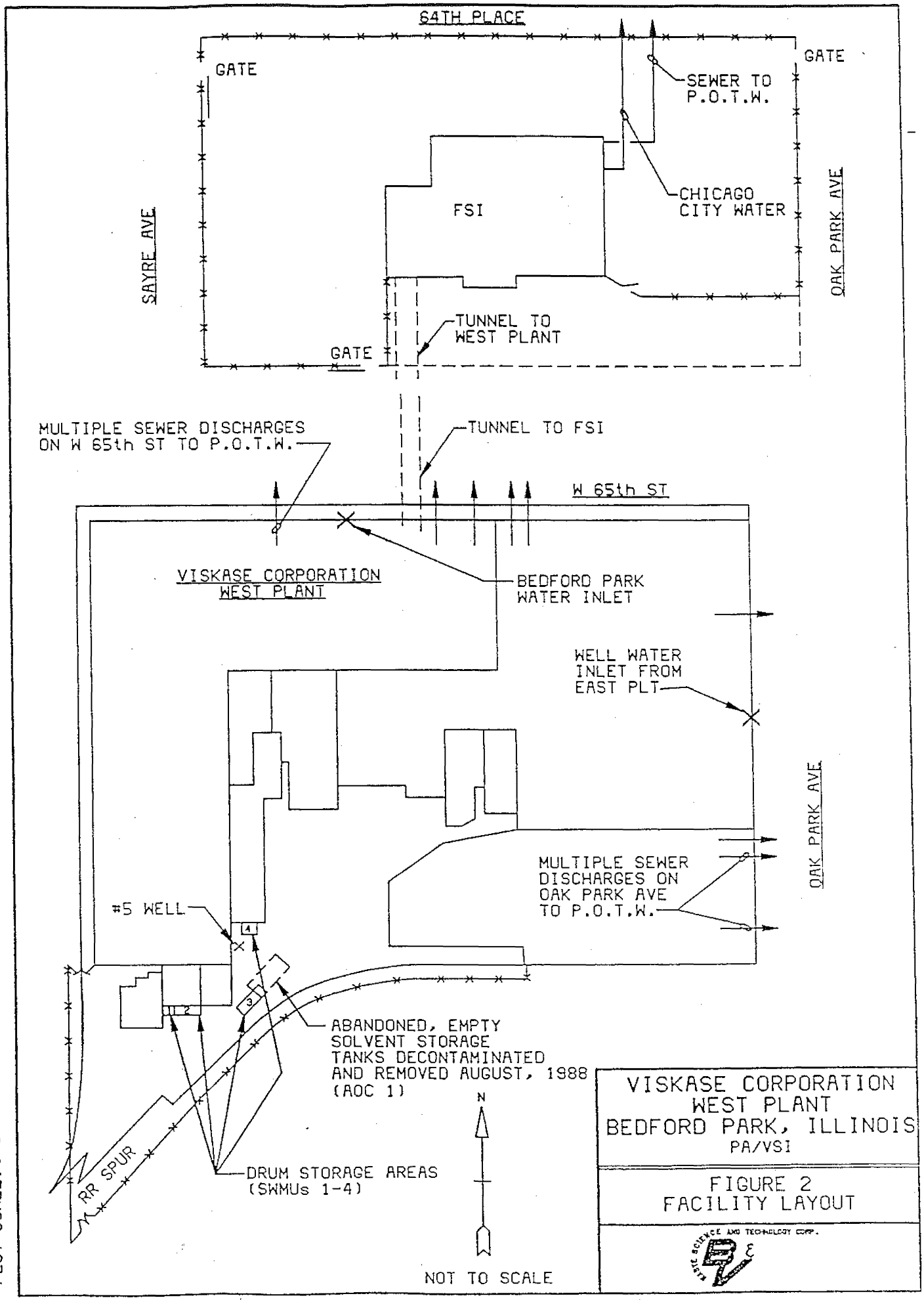
FIGURE 1
FACILITY LOCATION

Viskase Corporation has operated at its current West Plant location since 1986, and currently employs approximately 600 people. Viskase Corporation is a unit of Envirodyne Industries, Inc. The West Plant is a 270,000 square foot warehouse used jointly for offices, product storage, and the execution of the finishing operations. There is also a "Solvent Vault" (SWMU 2) and a small shed (SWMU 4) located on the southwest end of the plant.

Prior to 1986, Union Carbide Corporation was the owner and operator of the facility. The facility was part of the Films-Packaging Division of Union Carbide Corporation. Union Carbide also manufactured food casings. In November 1980, Union Carbide filed RCRA Part A Interim Status applications with respect to the storage of hazardous wastes in containers at the West Plant.

Facility operations at the West Plant have remained dedicated to the packaging films industry since plant start-up in 1947. No changes in the operation of the facility with respect to hazardous waste management activities occurred when Viskase Corporation completed the purchase of the West Plant in January 1986.

All wastes are placed in drums and stored in designated drum storage areas prior to disposition off site. The four SWMUs identified in the PA/VSI are all drum storage areas; these SWMUs are listed in Table 1. One AOC was also identified. It consists of the area where two removed underground solvent storage tanks were formerly located. A layout of the Viskase Corporation West Plant Facility, including the locations of the SWMUs and AOC, is shown in Figure 2.



CAD DWG NO:C0001189
DATE:9-23-91 PVT
PLOT SCALE:1=1

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Drum Storage Area	Yes	Inactive, never used for waste storage
2	Drum Storage "Solvent Vault"	Yes	Active
3	Drum Storage Area	Yes	Active, non-hazardous waste storage
4	Drum Storage Shed	Yes	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

2.3 WASTE GENERATING PROCESSES

The primary waste streams currently generated at the Viskase Corporation West Plant facility are mineral spirits and waste oil. Wastes generated previously include waste cyrel solvent, methylene chloride, 1,1,1-trichloroethane, 1-nitropropane, and 2-nitropropane. The wastes generated at the facility are discussed below and summarized in Table 2.

Mineral spirits (D001), also called petroleum naphtha, is a spent solvent generated during periodical degreasing and clean-up operations of fork-lift trucks, mechanical equipment, and other maintenance parts. These operations are done in the truck repair area using a "Safety Kleen" station. The rate of generation of this waste is approximately 75 gallons per year. This waste has been generated since before 1981 and continues to be generated. The mineral spirits is kept in the "Safety Kleen" station until it is picked up and disposed of by Safety Kleen Corp.

Waste 1,1,1-trichloroethane (F001, F002) was also used for the degreasing and cleaning of machinery. The rate of generation of this waste was about 1/2 drum per year. In 1989, however, petroleum naphtha replaced the use of this solvent. While it was still generated, the waste was drummed and stored in SWMUs 2 and 4. It was disposed of at EWR, Inc. in Coal City, Illinois.

Waste oil is a non-hazardous waste generated from the maintenance of mechanical equipment. It consists of hydraulic, gear box, and lubricating oils. The annual rate of generation of this waste is 10 to 12 drums. All waste oil generated is stored in the drum storage solvent vault (SWMU 2). SWMU 3 was also used for the storage of this waste in the past. Shipment of this waste is to Auganic Industries, Inc. in Cottage Grove, Wisconsin. Waste oil has been generated at this facility since before 1980 and continues to be generated.

Waste ink and methylene chloride were the waste streams generated from the ink making and printing operations. The hazardous constituent in the spent ink was 2-nitropropane (F005). This waste was generated from before 1980 to 1989. In 1989, the 2-nitropropane was replaced with 1-nitropropane (D001). 1-Nitropropane continued to be generated until the cessation of the printing operation that same year. The rate of generation of spent ink in any given year was about 5 drums. Waste methylene chloride (F001, F002), also called octastrip, was generated during the clean-up of the flexographic presses. It was generated from before 1980 until 1989, when the ink making and flexographic printing operations were discontinued. The rate of generation of this waste was approximately 1-2 drums per year. The ink and methylene chloride

wastes were placed in separate drums and stored in SWMUs 2 and 4. These wastes were then shipped to Auganic Industries, Inc. in Cottage Grove, Wisconsin.

The spent cyrel solvent (F002, F003) is a washout solution from the photographic plate making operation. The hazardous constituents in the spent solvent are perchloroethylene and butanol. This waste ceased to be generated in January 1991 when the plate manufacturing operation was discontinued. An alternate process was being proposed for the making of the plates, but no plan was ever implemented. In 1990, 10 30-gallon drums of this waste were generated. This waste is stored in SWMU 2 and is also shipped to Auganic Industries, Inc. in Wisconsin.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Mineral Spirits (Petroleum Naphtha) D001	Degreasing and clean-up operation	"Safety Kleen" station
Spent Cyrel Solvent** (Perchloroethylene, Butanol) F002, F003	Plate manufacturing	2
1-Nitropropane (Waste Ink)** D001	Ink making and flexographic printing	2, 4
2-Nitropropane** F005	Ink making and flexographic printing	2, 4
Waste Methylene Chloride** (Octastrip) F001, F002	Clean-up of ink making and flexographic printing operations	2, 4
Waste 1,1,1-Trichloroethane** F001, F002	Degreasing and clean-up operation	2, 4
Waste Oil Non-hazardous	Gear boxes, machine maintenance, and hydraulic oils	2, 3

Note:

* Primary management unit refers to a SWMU that currently manages the waste.

** These wastes are no longer generated.

2.4 HISTORY OF DOCUMENTED RELEASES

No documented contamination of surface water, sediment, soil, groundwater, or air were found for the West Plant facility. A RCRA Permit Information Form submitted by Viskase Corporation to IEPA in November 1988, states that , based on plant records and conversations with personnel, no releases have occurred from the solid waste management units located in the West Plant (Viskase Corporation, 1988d).

There have been releases at the Viskase Corporation East Plant facility, which is approximately 200 ft. to the east of the West Plant. These releases include air discharges and fuel oil spills. Please refer to the PA/VSI Report for the East Plant for additional information on these releases.

2.5 REGULATORY HISTORY

The West Plant currently operates under interim status; it is regulated as a generator and storer of hazardous waste. The first RCRA Part A permit application was submitted by Union Carbide Corporation in November 1980. This application listed the process code for storage in containers (SO1) of F001, F002, F003, F005, and D001 wastes (Union Carbide, 1980b). The facility was granted interim status in 1982 (U.S.EPA, 1982). In 1984 Union Carbide submitted a Closure Plan for its drum storage areas so as to comply with Hazardous Waste Regulations, Appendix G, Closure and Post-Closure (Union Carbide, 1984).

An amended Part A permit application was submitted in January 1986 to reflect that Viskase Corporation had become the new owner and operator of the West Plant facility. According to Viskase Corporation, no changes in the operation of the plant with respect to hazardous waste management activities occurred when ownership of the plant was transferred from Union Carbide Corporation to Viskase Corporation (Viskase Corporation, 1986a).

RCRA compliance inspections were conducted by IEPA in March 1987, April 1988, April 1989, and October 1990 (IEPA, 1987; IEPA, 1988; IEPA, 1989; IEPA, 1990). No violations were noted in any of the reports for these inspections, except for the April 1988 report. A minor violation was noted in the land disposal restrictions section of this report for the failure of the facility to mark dates on all drums of restricted waste upon entering storage (IEPA, 1988). Viskase Corporation responded to the violation with corrective action. Documentation demonstrating the implementation of the corrective action was submitted to U.S. EPA in June 1988 (Viskase Corporation, 1988b). BVWST found no records of other RCRA compliance inspections.

Upon request of IEPA, Viskase Corporation submitted a "RCRA Permit Information Form" in November 1988. By way of this form, Viskase Corporation made it known that the West Plant facility would not pursue a final RCRA permit for the hazardous waste management activities conducted there. Instead, all hazardous waste storage units at the facility would be closed prior to November 8, 1992 (Viskase Corporation, 1988d). It is the intent of the facility to become a small quantity generator. Closure plans are currently being formulated for the hazardous waste storage units at this facility by Dunn Geoscience Corporation of Downers Grove, Illinois (Dunn Geoscience Corporation, 1991).

Viskase Corporation has an IEPA operating permit which pertains to both the West Plant and the East Plant. This permit allows the operation of emission sources and air pollution control equipment. The only equipment in the West Plant that is covered under this permit are two flexographic presses. These presses emit volatile organic compounds, but their use has been discontinued. No other emission sources are located in the West Plant; all casing production facilities are in the East Plant. The operating permit, I.D. No. 031012ABQ, expires in January 1993.

All sewer discharges from the West Plant facility go to publicly owned treatment works (POTW), specifically the Metropolitan Water Reclamation District of Greater Chicago. No authorization is needed for the sewer discharges, but compliance with the Sewage and Waste Control ordinance, as amended July 7, 1988, is required.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater in the vicinity of the Viskase Corporation West Plant facility.

2.6.1 Climate

The climate in Cook county is classified as the humid continental type. It is cold and snowy in winter and warm in summer. The average daily temperature is 49.0°F. The lowest average daily minimum temperature is 13.3°F in January. The highest average daily maximum temperature is 82.4°F in July (Mapes, D.R., 1979).

The total annual precipitation is 33.34 in. Of this, 22 inches, or about 67%, usually falls in April through September. Thunderstorms occur on about 37 days each year. The heaviest 24-hour rainfall was

9.35 inches in August 1987 (National Weather Bureau, 1991). The mean annual lake evaporation for the area is 32 inches (IEPA, 1976).

The average seasonal snowfall is 39 inches. On the average, at least one inch of snow is on the ground for 32 days of the year.

The prevailing wind is from the west in winter, from the west and south-southwest in the spring, from the southwest in the summer, and from the south and southwest in the fall (Ruffner, 1977). The average wind speed is 10.3 mph.

2.6.2 Flood Plain and Surface Water

According to the Flood Insurance Rate Map series produced by the Federal Emergency Management Agency (FEMA), the West Plant facility lies in zone C and is therefore not located within the 500-year flood plan. The two SWMUs which handle hazardous waste (SWMUs 2 and 4) are enclosed, therefore the potential for rainfall runoff from these units is virtually nonexistent. All runoff from the facility would collect in storm sewers. All sewer discharges go to publicly owned treatment works (P.O.T.W.).

The nearest surface water to the West Plant facility is the Chicago Sanitary and Ship Canal, which joins the Illinois River System and Lake Michigan. The flow of the water is toward the west, away from Lake Michigan. It is located approximately two miles to the west and north of the facility. The Illinois and Michigan Canal is also approximately two miles west of the facility. It runs parallel to and is about 500 ft. away from the Chicago Sanitary and Ship Canal.

2.6.3 Geology and Soils

No site-specific geology information was available during the PA/VSI for the Viskase Corporation West Plant facility.

The surficial geology of the area is characterized by built-up urban areas and deep, nearly level, poorly drained soils that have a silty and clayey subsoil. These soils are formed in glacial lake sediment (Mapes, D.R., 1979). Soil borings taken in 1985 by Law Engineering Testing Company confirm this generalization. The borings were taken in the East Plant facility after the removal of carbon disulfide tanks. They revealed a clay layer from a distance of 1 foot beneath the surface, to at least 15 feet beneath the

surface, where the borings were terminated. Well logs from the three wells in the area, one of which is on-site, show a 92-foot layer of undifferentiated drift above the first layer of bedrock.

2.6.4 Groundwater

Groundwater is obtained from four major aquifer systems in northeastern Illinois -- the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrologic properties and recharge source areas (Hughes et al., 1966). In central Cook County the glacial drift is thin and sand and gravel deposits are corresponding thin or are absent. Virtually all wells drilled will have to penetrate bedrock for groundwater supplies. (Bergstrom et al., 1955).

The shallow bedrock aquifer system in northeastern Illinois underlies the glacial drift system and is mainly comprised of the Silurian dolomite formations. The upper boundary of this system is the bedrock-drift contact, and the lower boundary is the middle Ordovician age Galena-Platteville Dolomite. Water form this aquifer is obtained from fractures and solution openings in the Silurian dolomite beds (Hughes et al., 1966). The facility lies in an area where dolomite lies directly below the glacial drift which yields groundwater through open crevices and channels (Bergstrom et al., 1955). The shallow bedrock aquifer system is recharged locally from precipitation (Hughes et al., 1968).

The deep bedrock aquifer systems include the Cambrian-Ordovician aquifer system and the Mt. Simon aquifer system. The Cambrian-Ordovician aquifer system contains two major aquifers, the Glenwood-St. Peter aquifer and the Ironton-Galesville aquifer. The top of the Cambrian-Ordovician aquifer system is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely utilized where water requirements are less than 200 gallons per minute (gpm). This unit has a permeability between 9 and 15 gallons per day per square foot (gpd/sq. ft.). The Ironton-Galesville Sandstone aquifer has a permeability between 30 and 40 gpd/sq. ft. Recharge to the deep bedrock aquifer systems is mostly from west and north of the six county metropolitan area, where rocks corp out at the surface or lie immediately below the glacial drift. Minor recharge does occur through leakage downward through the shallow bedrock aquifer system (Hughes, et al., 1966).

The Mt. Simon aquifer system is bounded above the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by the crystalline pre-Cambrian basement rock. The average permeability of the aquifer system is 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely form the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Viskase Corporation West Plant facility occupies 8.3 acres of an industrial park in the village of Bedford Park, Illinois. The facility is surrounded on three sides by other industries, but a residential area exists to the north. 65th Street delineates part of the city of Chicago corporate limits (see Figure 1). The West Plant facility lies to the south of 65th Street, just outside of the Chicago city limits. The nearest residence is located across 65th Street, approximately 400 feet north of the facility, within the city of Chicago. Two schools, Blair School and St. Rene School, are located approximately 1,000 ft. away, also inside Chicago.

Access to the West Plant facility is controlled by fencing, a 24 hour security guard service, and regulated access points. The facility operational hours are from 7 A.M. to midnight, 5 days per week.

Drinking water for the village of Bedford Park is obtained through the City of Chicago's distribution system, which is obtained from Lake Michigan. Lake Michigan is over 10 miles distant. Groundwater in the vicinity is utilized primarily for industrial purposes. There is an industrial well located on the southwest side of the West Plant. Two other wells are located within the East Plant, which is approximately 200 ft. east of the West Plant. The water obtained from these wells is used for cooling, process water, and dilution of chemicals. The water from the well in the West Plant is currently not being used, but the well is not sealed.

There are no sensitive environments or endangered species within a two mile radius of the facility. The closest surface waters are the Chicago Sanitary and Ship Canal, located approximately two miles to the west and north of the facility, and the Illinois and Michigan Canal, which is less than two miles to the west of the facility. The primary use of the Chicago Sanitary and Ship Canal is for transportation.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 4 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and BVWST observations.

SWMU 1	Drum Storage Area
Unit Description:	This drum storage area is located outside on the southwest side of the facility, adjacent to the building. It is an 8 foot by 10 foot unpaved gravel area designated for the storage of drummed wastes in the initial and amended Part A permit applications, but its use as such has not been implemented (see Photograph 1).
Date of Start Up:	This unit was never used for the storage of any drummed wastes.
Date of Closure:	No closure necessary since the area was never used for the storage of drummed wastes.
Wastes Managed:	None.
Release Controls:	None.
History of Release:	None.
Observations:	Sparse vegetation along the perimeter of the unit. Pick-up truck parked over it.
SWMU 2	Drum Storage Solvent Vault
Unit Description:	An 8 foot by 12 foot enclosed room on the southwest section of the facility (see Photograph 2). This room has a concrete floor and is connected to the plant building. It is maintained locked at all times and is used for the

storage of drummed wastes. This SWMU has a storage capacity of approximately 14 drums.

Date of Start Up: This unit began operating some time before 1980; the exact start up date is unknown.

Date of Closure: This unit is currently operating. Closure is expected to be complete before November 8, 1992.

Wastes Managed: The primary wastes stored in this SWMU are spent cyrel solvent (F002, F003), and waste oil.

Wastes that have been stored in this SWMU in the past were 1-Nitropropane (D001), 2-Nitropropane (F005), Methylene Chloride (F001, F002), and 1,1,1-Trichloroethane (F001, F002).

Release Controls: Since the room is enclosed, the walls function as a containment system. The concrete floor also provides a means of control for releases. Spill control equipment such as sorbent materials and 85 gallon drums is also available.

History of Release: No releases were documented in the files available for the PA or during the VSI.

Observations: The "solvent vault" is maintained locked at all times; access is limited to authorized personnel. 5 drums of spent cyrel solvent were stored in this SWMU at the time of the VSI. There was no obvious surface contamination. The concrete floor appeared to be in good condition. This vault is also used for the storage of supply containers.

SWMU 3 Drum Storage Area

Unit Description: This unit consists of an outdoor unpaved, graveled area used for the storage of drummed wastes prior to disposition (see Photograph 3). It is 8 feet by 12 feet and has a storage capacity of approximately 16 drums. It is

	located in the southwestern section of the facility. It has not been used for the storage of hazardous wastes.
Date of Start Up:	This unit began operating some time before 1980; the exact start up date is unknown.
Date of Closure:	This unit is currently active. Closure of this SWMU is expected to be attained prior to November 8, 1992.
Wastes Managed:	The only waste stored in this area is waste oil. This area is not used for the storage of hazardous waste.
Release Controls:	No secondary containment system or release controls were implemented into the design of this unit.
History of Release:	No releases from this unit have been documented.
Observations:	This unit consists of a compacted gravel area outside the plant. No hazardous waste has been stored in this unit. The boundaries of this unit were not clearly defined; the only delineation was a white paint mark directly on the graveled ground at each corner of the unit. No evidence of current or former releases was apparent during the VSI. No wastes were stored in this SWMU at the time of the VSI. This SWMU will not be used in the future (Viskase Corporation, 1991).
SWMU 4	Drum Storage Shed
Unit Description:	The drum storage shed is located outside the plant on the southwest side of the facility (see Photograph 4). It is adjacent to the plant building and is 10 feet by 10 feet. This shed has the capacity to store approximately 10 drums. It has a concrete floor and sheet metal walls, but there is no door to control access. Drummed wastes are stored in this unit prior to disposition.

Date of Start Up:	This unit began operating some time before 1980; the exact start up date is unknown.
Date of Closure:	This unit is currently operating. Closure is expected to be attained prior to November 8, 1992.
Wastes Managed:	The primary wastes stored in this unit were 1-Nitropropane (D001), 2-Nitropropane (F005), Methylene Chloride (F001, F002), and 1,1,1-Trichloroethane (F001, F002). These wastes are no longer generated.
Release Controls:	Other than the concrete floor, there is no secondary containment such as berms, dikes, or sumps. There is a curb around the perimeter of the shed, but the effectiveness of this curb as a containment system is neutralized by its discontinuity at the entrance/exit to the shed.
History of Release:	No documented releases were encountered during the PA and VSI for this unit.
Observations:	No drummed waste was stored in this unit at the time of the VSI. The concrete floor appeared to be in good condition. No evidence of releases was observed. This unit has an open entrance/exit; the only means of access control is a posted sign instructing unauthorized personnel to keep out.

4.0 AREAS OF CONCERN

BVWST identified one AOC during the PA/VSI. This AOC is discussed below. Its location is shown in Figure 2.

AOC 1 **Former Underground Storage Tank Area**

Two underground solvent storage tanks were formerly located in the southwest section of the facility, adjacent to SWMU 3. Each tank had an estimated volume capacity 5,000 gallons. They had been out of service prior to 1974; the exact date is unknown (Viskase, 1991a). The solvent believed to have been stored in these tanks is propyl alcohol, but it is not certain because records of manifests were unavailable and the tanks were abandoned before Viskase Corp. assumed ownership of the West Plant facility (Borsuk, Edward J., 1991). The tanks were decontaminated and removed in August 1988 (Viskase, 1988c). The area where these underground solvent storage tanks were located is considered an AOC because no sampling was ever done to test the soil or groundwater for possible contamination.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 4 SWMUs and one AOC at the Viskase Corporation West Plant facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented release and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are BVWST's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs and AOCs at the Viskase Corporation West Plant facility and suggested further actions.

SWMU 1 **Drum Storage Area**

Conclusions: This storage area is outside and located on compacted dirt and gravel. The possibility of a spill or release to environmental media is non-existent because this unit was never used for the storage of any wastes. It was designated as a drum storage area on initial and amended Part A permit applications, but its use as such has not been implemented.

Recommendations: No further action is suggested at this time.

SWMU 2 **Drum Storage Solvent Vault**

Conclusions: The Solvent Vault is an enclosed room connected to the plant. Drummed wastes are stored in this unit over a concrete floor. The unit is maintained locked at all times so as to limit access to authorized personnel. The concrete floor and walls provide a means of secondary containment. No evidence of releases was encountered. Releases could occur during loading and unloading of drums. Plans are being developed for the closure of this SWMU. The closure is expected to be complete prior to November 1992, and will substantially reduce the possibility of a release. The current potential for release via environmental media is summarized below:

Groundwater: Low. The unit is indoors on a solid concrete floor. Storage is in containers, and the walls would prevent a spillage from exiting this SWMU.

Surface Water: Low. There is no surface water nearby.

Air: Low. Storage is in sealed containers.

On-Site Soils: Low. There is no exposed ground surface near the storage unit.

Recommendations: No further action is suggested at this time.

SWMU 3 Drum Storage Area

Conclusions: This drum storage area is outside and located on compacted gravel. There is no release controls or secondary containment system for this unit. Access is unrestricted to anyone inside the West Plant. No hazardous wastes are stored in this area. There was no evidence of releases from this unit. The possibility of a release in the future is low because the use of this unit as a storage area for drummed wastes has been discontinued. This unit is expected to go through a formal closure process prior to November 1992; this will further reduce the potential of a release. The current potential for release via environmental media is summarized below:

Groundwater: Low. There is a potential for a contaminant release to groundwater if the integrity of the storage drums is breached. However, this SWMU will not be used in the future pending its closure.

Surface Water: Low. There is no surface water nearby.

Air: Low. Storage of wastes is in sealed containers.

On-Site Soils: Low. The floor for this unit consists of gravel, and access is not restricted. Releases can occur if the integrity of the storage drums is breached, but this is unlikely since the use of this SWMU in the future is not planned.

Recommendations: No further action is suggested at this time.

SWMU 4 **Drum Storage Shed**

Conclusions: The Drum Storage Shed is located outside, adjacent to the plant building. This unit has a concrete floor and sheet metal walls, but no door to limit access. Other than the concrete floor, there is no effective secondary containment system. No evidence of releases was encountered. The possibility of a release will be significantly reduced once this SWMU has undergone closure. The current potential for release via environmental media is summarized below:

Groundwater: Low. Storage is in containers, and the unit has a solid concrete floor. However, a large spill could potentially move across the floor and exit the shed at the point were the curb is discontinuous.

Surface Water: Low. There is no surface water nearby.

Air: Low. Storage of wastes is in sealed containers.

On-Site Soils: Low. Unit has a solid concrete floor, and storage is in containers. Outside, around the perimeter of the shed, two sides have a graveled ground surface. A spill could potentially move across the floor and exit the shed.

Recommendations: Control of access to the unit should be improved. A secondary containment system should be constructed for this unit that can handle spilled materials.

AOC 1 Former Underground Storage Tanks Area

Conclusions: This AOC is the area where two underground solvent storage tanks were previously located. The tanks were out of service prior to 1974 and were decontaminated and removed in 1988. However, no sampling was ever done to test the soil or groundwater for possible contamination. It is possible that contaminated soil remains onsite.

Recommendations: Deep soil sampling should be conducted in the area where the tanks were located to determine if hazardous constituents are present.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Drum Storage Area	Never used.	No evidence of release was noted in the file material and no visible evidence of release was observed during the VSI.	No further action is suggested at this time.
2. Drum Storage Solvent Vault	Before 1980 to present	No evidence of release was noted in the file material and no visible evidence of release was observed during the VSI.	No further action is suggested at this time.
3. Drum Storage Area	Before 1980 to 1991	No evidence of release was noted in the file material and no visible evidence of release was observed during the VSI.	No further action is suggested at this time.
4. Drum Storage Shed	Before 1980 to present	No evidence of release was noted in the file material and no visible evidence of release was observed during the VSI.	Restrict access. Construct a secondary containment system.

AOC	Operational Dates	Evidence of Release	Suggested Further Action
1. Former Underground Solvent Storage Area	Out of service prior to 1974, exact date unknown.	No evidence of release was noted in the file material and no visible evidence of release was observed during the VSI.	Collect deep soil samples in the area where the tanks were located to determine if hazardous constituents are present.

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ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Viskase Corporation - West Plant
Bedford Park, Illinois
ILD 000 821 462

Date:	August 6, 1991
Facility Representatives:	Edward J. Borsuk, Environmental Coordinator
Inspection Team:	Donald Huff, B&V Waste Science and Technology Corp. Matt Mastronardi, B&V Waste Science and Technology Corp. Miguel Sanchez, B&V Waste Science and Technology Corp.
Photographer:	Matt Mastrondardi
Weather Conditions:	Overcast, warm, temperature between 70 and 80°F.
Summary of Activities:	The Visual Site Inspection (VSI) for the West and East Plant facilities was conducted concurrently. The results of the PA/VSI for the East Plant are documented in a separate report. The VSI began at 9:20 am with an introductory meeting. The inspection team began the meeting with a discussion of the purpose of the VSI and the agenda for the visit. Edward Borsuk then filled out a "Government Environmental Inspection Report" to document the purpose and events of the visit. The meeting continued with Mr. Borsuk providing a description of the facility operations, solid wastes generated, waste management activities, and an overview of the layout for both the West and East Plants. Most of the information was exchanged on a question-and-answer basis. Mr. Borsuk provided the inspection team with some of the documents requested and promised to mail the rest at a later date. The tour of the East Plant began after the introductory meeting at approximately 11:15 am. During the tour, photographs were taken of all solid waste management areas and the production process was further explained. The tour of the East Plant ended at 12:30 p.m. and the inspection team left the facility for lunch. The inspection team returned to the facility at 1:25 p.m. to tour the West Plant facility. Photos were taken of all the solid waste management areas in this facility. The tour of the West Plant was concluded at 2:05 p.m. The inspection team then held a short exit meeting with Mr. Borsuk in the East Plant. The VSI was completed at 3:20 p.m.

Photograph No. 1
Orientation: North
Description: Drum Storage Area No. 1. Never used. Pick-up truck parked over it.

Location: SWMU 1
Date: 08/06/91

Photograph No. 2
Orientation: Southwest
Description: Solvent Vault – Drum Storage Area No. 2

Location: SWMU 2
Date: 08/06/91

Photograph No. 3 Location: SWMU 3
Orientation: North Date: 08/06/91
Description: Drum Storage Area No. 3. Graveled area; boundaries very poorly defined.

Photograph No. 4 Location: SWMU 4
Orientation: Northwest Date: 08/06/91
Description: Small shed – Drum Storage Area No. 4. Adjacent to plant, no door.

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

PA / VSI

Miguel A. Sanchez

D. Huff
M. Mastronardi
M. Sanchez

70° → 80°
Overcast
Slightly Warm

08/06/91

Location: Viskase Corp. - East Plant*
6733 W. 65TH St.
Chicago, IL 60638
Bedford Park

09:20 Arrived at Viskase met with Edward J. Borsuk - Environmental Coordinator

09:30 At Ed's office. Ed had to fill out a "Government Environmental Inspection Report"

09:35 Ed gave us an overview of Viskase's manufacturing process for sausage casing.

Gave us a copy of a flow chart showing manufacturing processes. "Viskase Cellulose Casing Process" and "Chemical Reactions"

Miguel A. Sanchez 8/6/91

* Note: During this VSI, two plants with SEPARATE U.S.EPA I.D. NO.'s were inspected, both of which are owned by Viskase Corp. The EAST Plant (USEPA I.D. No. ILD005152954) is located as stated in page ①. The WEST Plant location is:
6855 W. 65TH St.
Bedford Park, IL 60638
(USEPA ID. No. ILD000821462).

BVWST: Donald Huff
Matt Mastronardi
Miguel Sanchez

VISKASE CORP.: Edward J. Borsuk
(Environmental Coordinator)

Miguel A. Sanchez
8/6/91

PA / VSF (continued)

Miguel A. Sanchez

Viskase produces regenerated cellulose food casings.

Air Emissions: (Chicago Plant IEPA operating Permit)

- Stream passes through scrubbers
- Ventalation
- Hydrogen Sulfide (Removed by Scrubbers)
- Carbon Disulfide (Permit for emission into air)
- Two boilers → SO_2
- Driers

Miguel A. Sanchez
8/6/91

Miguel A. Sanchez
8/6/91

Liquid Wastestreams:

- Liquid bath for casings contains
  - Sulfuric Acid
  - Sodium Sulfate
  - Amonium "
  - Viscose

Solid Wastestreams:

- Solid Sulfur accumulated in container
- off-code casings → refuse
- trenches carry liquid viscose
  - → solidified viscose scrapped off
  - → put in w/ lime (treated in container)
  - → exempt → landfill
- tank cleaning residues (rarely) approx. every 5 → 10 years. Analyzed for properties and disposed of appropriately.

Miguel Sanchez

PA / VSI (continued) — Miguel A. Sanchez 8/6/91

- Caustic Residue
- No haz. waste present on-site at time of VSI on East Plant
- Contaminated Soil found previously while excavating for new Co-Generator. Shipped as a special waste. Co-gen excavation ~ 1500 yd^3.

- Chicago Manufacturing Plant → 330 → 350 employees
- Envirodyne took over → Viskase (1986)
- Envirodyne is a holding Co.
- No processes have changed.

Miguel A. Sanchez 8/6/91

Miguel A. Sanchez 8/6/91

- Wells - Several wells on-site
  - well water softened and used as process water & cooling
  - also for dilution of chemicals
  - #5 well inactive (not in use, but not sealed)
  - Layne Western periodically reconditions wells.
- 9 Million → 1 Billion total liquid effluent
- 6 Drum Storage Areas in East Plant
- 4 " " " " West Plant
- Other Solid Waste: Sulfur (Switch over to solid sulfur expected this week).
- Note: Need to review land fill permits → State Special Waste Authorizations

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Miguel A. Sanchez 8/6/91

PA/VSI (continued)

Miguel A. Sanchez

- Closure of all drum storage areas. Will become a small quantity generator.

- Previous Printing operation in West Plant.
  - → Mixed ink
  - → ink wastes → haz. chemicals
  - → Only one haz. waste
    - ↳ Washout solution
      - ∧ Cyrel Plate
      - → Perchlorethylene
      - Butonol

- Parts Washing (by Safety Clean) (not a SWMU).

- Lab. Pack wastes → Not Stored

- Plate washout Solution
  Spent ink → 1, Nitropropane.
  Don't do anymore.

Miguel a. Sanchez 8/6/91

Miguel a. Sanchez 8/6/91

- East Plant Drum Storage Areas
  - #1 : active
  - #2 : no haz. waste stored since 1940
  - #3 : " " " " " "
  - #4 : stored solidified viscose (none present at time of visit, only paper on palats.)
  - #5 : active haz. waste storage areas "Solvent Shed"
  - #6 : Pavement Area → no haz. waste

  Past Storage Area
  - no liquid viscose stored
  - after 1981 nothing stored
  - may have stored empty tanks

- West Plant Drum Storage Areas
  - #1 : never used
  - #2 : 1,1 trichlorethene
    1, Nitropropane
  - #3 : Outside (gravel) never used for storage of haz. waste
  - #4 : 1,1,1, Trichloroethene

Miguel a. Sanchez 8/6/91

⑨ PA / VSI (Continued) Miguel A. Sanchez 8/6/91

11:15 East Plant walk-through

Previous Drum storage area

11:25 Photograph #1
- Previous Drums Storage Area - no drums present
- Orientation → West
- Photo by M. Mastenardi

Photo #2
same as #1

Drum Storage Area #1.
Photo #3
- waste oil
- ten drums - solidified viscose
- approx. 35 drums total
- orientation = South

Miguel A. Sanchez 8/6/91

Miguel A. Sanchez 08/06/91 ⑩

11:35
Photo #4
Drum storage area #3
orientation = West
no waste presently stored

11:37 Photo #5
Storage Area #2
orientation = South
no waste stored presently.

11:40 Photo #6
Storage Area #5 - shed
Dry pit to drain any spills
orientation = NE

Photo #7
Storage Area #5
Shed (locked) adjacent to building
orientation = S
2 drums on-site
waste oil

Miguel A. Sanchez 8/6/91

PA/VSI Miguel A. Sanchez
(Continued) 8/6/91

11:45 Photo #8
Dumpster containing
Elemental Sulfur
Orientation = NE

11:47 Photo #9
Storage Area #6
No waste present at time
of visit
orientation = South

11:50 Photo #10
Storage Area #1
No waste present (only boxes)
orientation = North
inside building

11:55 Looked at neutralization
which occurs in a
series of underground
sewers which connect to street sewer
PH detector

Miguel A. Sanchez

Miguel A. Sanchez
8/6/91

11:56 Photo #11 MS.
Neutralization.
Orientation = SE

11:59 Photo #12 MS.
New Sulfur Scubber system
orientation = N
dock buggy in for front

12:01 Photo #13 MS.
Viscose dilution station
In sewer (Trenches leading out)
orientation = S

12:02 Photo #14 MS.
Filter cloth wash machines
orientation = N

Miguel A. Sanchez 8/6/91

(13) PA/VSI (continued) Miguel A. Sanchez 8/6/91

12:06 Showed us "Past Disposal Area" Currently construction going on for Co-Gen

12:10 former Underground Storage tank site (Tanks previously Removed) A.O.C. Tanks were for fuel storage Photo #~~14~~ M.A. 15

Spill (#6 fuel oil) – Stain on soil Currently negotiated and reported. Need to review!! Most recent excavation at this site.

Use both well water and city water

Miguel A. Sanchez 8/6/91

M. Mastromarsh Tue 8/6/91 (14)

12:30 leave for lunch
13:25 return from lunch
13:35 Enter West plant
13:39 View solvent vault
Photo 16
Solvent vault (storage area #2 of west plant)
13:47 View storage area #1
Photo 17 of storage area #1

13:49 photo 18 - storage area #4
13:50 photo 19 - storage area #3
14:03 View finishing area - internal coating of casing
14:05 leave West plant
14:10 Enter East plant - M.A.M. Don Huff & Miguel Sanchez meet again in Ed Borsuk's office w/ Ed.

13:55 photo 20 - plate washing area

Matt Mastromarsh

(15) PA / VSI (Continued) Miguel A. Sanchez 8/6/91

List of info. requested From Ed Borsuk:

- Chicago Plant IEPA Operating Permit
- Co-Gen Excavation Soil Records
  → lab analysis recommendation
- Acreage of plant; square ft. of plant
- Copy of up-to-date site map
- "Past disposal site" borings
  → underground CS_2 tanks
  → size, age of tanks, when buried, removal date
- Solidified Viscose permit and/or characterization
- Landfill permits (State Special Waste Authorizations).
- Proposal for RCRA closure of storage areas
- "RCRA Permit Info. Form" (dated 11/3/88)
- Former site of buried fuel oil tanks
  → response; remediation reports
- Inventory of all drummed wastes in all storage areas.

15:20 Left Viskase Corp.

Miguel a. Sanchez
8/6/91

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

Compliance

REPLY TO ATTENTION OF:
5HR-12

July 24, 1991

Mr. Edward J. Borsuk
Viskase Corporation
6733 West 65th St.
Bedford Park, IL 60638

Re: Visual Site Inspection
Viskase Corporation
ILD 000821462 (West Plant)

Dear Mr. Borsuk:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern, and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI will be conducted on Tuesday, August 6, 1991, immediately following the VSI at the East Plant. The inspection team will consist of Miguel Sanchez and Matt Mastronardi of B&V Waste Science and Technology Corp., contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion, may be made available upon request.

Sincerely yours,

Sheri F. Bianchin

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Larry Eastep, IEPA - Springfield
Donna Czech, IEPA - Maywood

UNION CARBIDE CORPORATION 6733 W. 65TH STREET, CHICAGO, ILLINOIS 60638
Films - Packaging Division

February 24, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

RCRA Activities
Region V
P.O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Gentlemen:

Enclosed, please find the completed U.S. EPA questionnaire "Certification Regarding Potential Releases from Solid Waste Management Units", which was received by our facility on January 17, 1986. Per a February 20th phone conversation between Mr. James Mayka of your office and our Nick L. Maoloni, Mr. Mayka concurred that the scope of this response could be limited to those Solid Waste Management Units at our Chicago, Illinois facility which have the potential to release hazardous waste or hazardous constituents to the environment, primarily groundwater. Consequently, this response has been prepared upon a review of pertinent, available records and inquiries of knowledgeable personnel, and I certify that the information is complete and accurate to the best of my knowledge.

> NOTE: Per the above referenced conversation with Mr. Mayka, this response does not include those Solid Waste Management Units which we have determined do not have the potential to release hazardous waste or hazardous constituents to the environment. Examples of units not reported here include non-hazardous refuse roll-off boxes, scrap metal/wood piles, and wastewater surge tanks.

If you should have any further questions or comments concerning our response, please feel free to contact me at your earliest convenience.

Sincerely,

N. T. LaPlaca
Chicago Plant Manager

NTL:po
1565K

Att.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Union Carbide Corporation

EPA I.D. NUMBER: ILD 000821462

LOCATION CITY: 6855 West 65th Street, Chicago 60638

STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

Not applicable.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   Not applicable.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   Not applicable.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

N. T. LaPlaca, Plant Manager
Typed Name and Title

N. T. LaPlaca
Signature

2/24/86
Date